

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Missouri Coalition for Fair Competition)	
and)	
Corey Malone,)	
Complainants,)	
)	
v.)	<u>File No. EC-2023-0037</u>
)	
Union Electric Company d/b/a Ameren)	
Missouri,)	
Respondent)	

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE STAFF REPORT**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Second Motion for Extension of Time to File Staff Report*, states as follows:

1. On August 3, 2022, the Missouri Coalition for Fair Competition and Corey Malone (hereafter “Complainants”) filed a *Complaint* against Union Electric Company d/b/a Ameren Missouri (hereafter “Ameren Missouri”). Ameren Missouri filed its *Answer, Affirmative Defenses, and Motion to Dismiss* on September 6, 2022.

2. On October 21, 2022, the Commission issued an *Order Directing Staff to Investigate and File a Report*; in its Order, the Commission directed Staff to file a report or request an extension of time no later than November 21, 2022.

3. Staff filed a *Motion for Extension of Time to File Staff Report* on November 17, 2022, requesting an additional 45 days to analyze data and information from the parties and to conduct further discovery. The Commission granted that *Motion*, and ordered Staff to file its report by January 5, 2023.

4. The parties met by conference call on December 15, 2022, to discuss the matter but did not reach any resolution. Additionally, responses to two data requests sent to Complainant on November 3, 2022, were not received until December 29, 2022.

5. Staff needs time to review and analyze the information it just received from Complainant in response to the two data responses it sent out early this case.

6. Staff requests an additional 45 days in which to complete and file its report and recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for Complainants, Ameren Missouri, and the Office of the Public Counsel have been contacted regarding this motion, and no party objects to the granting of an extension of time in this matter.

8. This *Motion* is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Second Motion for Extension of Time to File Staff Report* for the Commission's information and consideration and hereby prays the Commission grant Staff an additional 45 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 3rd day of January, 2023, to all counsel of record.

/s/ Carolyn H. Kerr