BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Charles Harter,)
Complaina	nt,)
v.) Case No. EC-2021-0285
Union Electric Company d/b/a)
Ameren Missouri,)
Respondent	·.)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and for its *Motion for Extension* respectfully states:

- 1. On March 11, 2021, Charles Harter ("Complainant") filed a small formal complaint ("Complaint") against Union Electric Company d/b/a Ameren Missouri ("Respondent").
- 2. Also on March 11, 2021, the Commission issued its *Order Giving Notice of Case Filing, Directing an Answer and Directing a Staff Investigation*. The Commission ordered Respondent to file an Answer to the Complaint no later than April 9, 2021, and directed Staff to conduct an investigation of the Complaint and file a report no later than May 10, 2021.
- 3. Respondent filed a *Motion for Extension of Time* on April 9, 2021, requesting a 21 day extension to file its Answer, noting that Respondent and Complainant were working together to resolve the Complaint. The Commission granted Respondent's request on April 12, 2021, and ordered Respondent to file its Answer no later than April 30, 2021.
 - 4. On April 30, 2021, Respondent filed its Answer to the Complaint
- 5. Staff is still conducting its investigation, and is currently awaiting a response to a data request from Respondent, with a due date of May 18, 2021.

6. In order to give Respondent the necessary time to respond, and for Staff to analyze and incorporate the response into its report, Staff respectfully requests that the Commission grant an extension to file Staff's report through May 24, 2021, per Commission Rule 20 CSR 4240-2.070(15)(D). Staff has conferred with the Complainant and Respondent, and neither party objects to this request.

WHEREFORE, Staff prays that the Commission will grant this *Motion for Extension* and issue an order setting a new deadline for Staff's Investigation Report on May 24, 2021, and such other and further relief as the Commission deems just in these circumstances.

Respectfully Submitted,

/s/ Travis J. Pringle

Travis J. Pringle
Missouri Bar No. 71128
Associate Counsel for the Staff of the Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102-0360
(573) 751-4140 (Telephone)
(573) 751-9285 (Facsimile)
(Email) travis.pringle@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record this 5th day of May, 2021.

/s/ Travis J. Pringle