

**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.)	

**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 *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 has and will continue to issue data requests to aid in its review; however, the parties’ responses to Staff’s initial rounds of data requests have either not yet been received (as the time for responses has not expired) or have spurred the need for further investigation and additional discovery.

4. Further, as is common practice in cases regarding consumer complaints, Staff requests additional time to review the information provided thus far and determine if further information is needed.

5. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from both parties, and complete its investigation, 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.

6. 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.

7. 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 *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 17th day of November, 2022, to all counsel of record.

/s/ Carolyn H. Kerr