

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

Charles A. Harter,)	
)	
Petitioner,)	
)	
vs.)	<u>Case No. EC-2023-0281</u>
)	
Union Electric Company d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

**Staff’s Motion for Leave to Appear Virtually
or by Telephone and
Request for Expedited Treatment**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Leave to Appear Virtually or by Telephone and Request for Expedited Treatment*, states as follows:

1. This matter is set for hearing on Monday, July 17, 2023, at 10:00 A.M. at the Wainwright State Office Building in St. Louis, Missouri.
2. Staff’s assigned personnel are based at the Jefferson City, Missouri, office of the Commission.
3. Travel between St. Louis and Jefferson City requires two hours, each way.
4. Staff’s involvement in this case is limited. Staff has investigated Mr. Harter’s *Complaint* and submitted a report. Staff’s single witness, Lisa Stockman, will provide a foundation for the admission of Staff’s report into the record and will answer any questions concerning Staff’s investigation and report.
5. Some of Staff’s personnel are heavily engaged in other cases, such that four hours of travel time, during which nothing may be accomplished, will seriously impact

Staff's preparation of those other cases.

6. Additionally, some of Staff's personnel have family and other obligations that will be impeded by travel to and from St. Louis on Monday.

7. Staff's participation in the hearing will not be obstructed or diminished if Staff is permitted to appear virtually or by telephone.

8. Staff's witness is planning to attend the hearing in person. Staff Counsel requests leave to appear virtually or by telephone.

9. Staff further requests that its motion be considered on an expedited basis given the shortness of time remaining before the hearing next week.

WHEREFORE, Staff prays to be granted leave to appear either personally or virtually, or by telephone, at the hearing in this matter on Monday, July 17, 2023, at 10:00 A.M. at the Wainwright State Office Building in St. Louis, Missouri, and that the Commission will take up its motion on an expedited basis; and for such other and further relief as is just in the premises.

Respectfully submitted,

/s/ Kevin A. Thompson
KEVIN A. THOMPSON
Missouri Bar Number 36288
Chief Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-6514 (Voice)
573-526-6969 (Fax)
kevin.thompson@psc.mo.gov

Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties herein pursuant to the Service List maintained by the Commission's Data Center on this **10th day of July, 2023**.

/s/ Kevin A. Thompson