BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Authorization to Enter into a Contract with a Third-Party for Utilization of Fiber Optic Capacity Not Currently Utilized for Electric Operations

File No. EM-2021-0309

SECOND MOTION FOR EXTENSION

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

1. On June 11, 2021, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed an application to lease fiber capacity to MCC Network Services, LLC. According to paragraph 3 of its application, the fiber capacity which Ameren proposes to lease is over an approximately 1.67 mile section of the Sioux to Meppen transmission line.

2. On June 14, 2021, the Commission ordered Staff to file a recommendation regarding Ameren's application or an alternative pleading by July 14, 2021.

3. On July 14, 2021, Staff moved for an extension of time to September 13, 2021 to file its recommendation in order to receive responses to recently filed data requests and incorporate these responses in its recommendation. The Commission granted Staff's motion on July 14, 2021 and ordered Staff's recommendation due by September 13, 2021.

4. On September 8, 2021, Staff submitted a data request to Ameren requesting clarification of the relation between this project and the research and development project at the Sioux Energy Center. Ameren responded September 9, 2021.

Staff requests additional time to September 22, 2021 to incorporate this information into its recommendation. Staff will file its recommendation earlier, if possible.

5. Counsel exchanged emails with counsel for Ameren, and counsel for Ameren represented that Ameren does not object to this request.

WHEREFORE, Staff moves the Commission for an order setting a new deadline for its recommendation of September 22, 2021.

Respectfully submitted,

<u>/s/ Karen E. Bretz</u>

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CERTIFICATE OF SERVICE

I certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 10th day of September, 2021.

<u>/s/ Karen E. Bretz</u>