

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

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

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, and for its *Motion for Extension* respectfully 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.
2. On June 14, 2021, the Commission issued its *Order Directing Filing*, ordering Staff to file either a recommendation regarding Ameren’s Application or an alternative pleading no later than July 14, 2021.
3. Staff filed new data requests on July 8, 2021. In order to provide Ameren time to respond to Staff’s data requests, as well as give Staff time to analyze Ameren’s responses and conduct any necessary follow-up, Staff anticipates a filing date no later than September 13, 2021.

WHEREFORE, Staff prays that the Commission will accept this *Motion for Extension* and issue an order setting a new deadline for Staff’s recommendation on September 13, 2021, and any such other and further relief as the Commission deems just in these circumstances.

Respectfully submitted,

/s/ Travis J. Pringle

Travis J. Pringle

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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 on this 14th day of July, 2021.

/s/ Travis J. Pringle