

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

In the Matter of the Application of)	
Thomas L. Chaney for a Change of Electric)	<u>File No. EO-2011-0391</u>
Supplier)	

MOTION FOR EXTENSION OF TIME TO FILE BRIEFS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and on behalf of Staff and Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") moves for an extension of time to file briefs in this matter. For this *Motion*, Staff states the following to the Missouri Public Service Commission ("Commission"):

1. On September 10, 2012¹, the Commission convened an evidentiary hearing in this matter.
2. On the same date, the Commission directed the parties to file post-hearing briefs no later than 14 days after the court reporter filed the transcript in the Commission's electronic filing and information system ("EFIS").
3. On September 24, the court reporter filed the transcript, making the briefs due October 8. Staff notes that its admitted exhibit has not been entered into EFIS to date.
4. Due to the press of other business and a death in the immediate family of Ameren Missouri's counsel, Staff and Ameren Missouri request an extension of time until October 19 to file briefs in this matter.
5. The Applicant, Mr. Chaney, and counsel for Cuivre River Electric Cooperative, Inc., do not object to this extension of time.

¹ All dates herein refer to calendar year 2012.

WHEREFORE, Staff files this *Motion* for an extension of time for the Commission's information and consideration and requests the Commission allow the parties until October 19, 2012, to file post-hearing briefs in this matter.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez
Senior Staff Counsel
Missouri Bar No. 59814

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751- 8706 (Telephone)
(573) 751-9285 (Fax)
jennifer.hernandez@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing have been sent by electronic mail to Thomas L. Chaney at tomeygun@gmail.com; Wendy K. Tatro, counsel for Ameren Missouri at AmerenMOService@ameren.com; Rodric A. Widger, counsel for Cuivre River at rwidger@lawofficemo.com; and Lewis Mills, counsel for the Office of the Public Counsel at opcservice@ded.mo.gov on this 4th day of October, 2012.

/s/Jennifer Hernandez