

**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) **File No. EO-2011-0391**
Supplier)

STAFF’S MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and files this Motion with the Commission respectfully stating the following:

Background

1. On June 10, 2011, Thomas L. Chaney (Applicant) filed an *Application For Change Of Electric Service Provider (Application)* requesting the Commission to approve changing his electric supplier from Cuivre River Electric Cooperative, Inc. (Cuivre River) to Union Electric Company d/b/a Ameren Missouri (Ameren Missouri).

2. On March 13, 2012, the parties participated in a prehearing conference and discussed the filing of motions for summary determination and responses. On the same date the Commission’s *Notice of Case Procedure* ordered the discussed procedure, in particular, the Staff’s response deadline of 15 days after Ameren Missouri and Cuivre River filed a motion for summary determination. On April 19, 2012, Ameren Missouri and Cuivre River filed a *Joint Motion to Dismiss for Lack of Subject Matter Jurisdiction and for a Determination on the Pleadings* and a *Memorandum of Law in Support of the Motion to Dismiss for Lack of Subject Matter Jurisdiction and for a Determination on the Pleadings*.

3. Due to the Staff's workload and the undersigned's recent return from an extended leave, the Staff requests an extension until May 21, 2012, to respond to the filings.

4. The Applicant, Ameren Missouri, Cuivre River, and the Office of the Public Counsel do not object to this request.

WHEREFORE, the Staff files this Motion and requests the Commission allow the Staff to file its response no later than May 21, 2012.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez
Senior Staff Counsel
Missouri Bar No. 59814

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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 May, 2012.

/s/Jennifer Hernandez