BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In The Matter Of A Repository File Concerning Staff's Review Of The Commission's Fuel Adjustment Clause Rules

File No. EW-2011-0139

MOTION FOR EXTENSION OF STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, for its *Motion for Extension of Staff Recommendation,* states as follows:

1. On February 4, 2015 the Commission issued an *Order Regarding Timeline for Review*, wherein Staff was directed to provide the Commission with its recommendation regarding changes to the fuel adjustment clause rules by September 15.

2. In addition, Staff was directed to hold additional rulemaking workshops and that additional dates may be established for various actions by Staff and stakeholders.

3. Rulemaking workshops were held on April 27, July 9, and August 13, wherein Staff and stakeholders have worked diligently to prepare collaborative revisions to the Commission Rule.

4. On August 13, 2015 parties participating in the rulemaking workshop agreed that substantive progress had been made, but Staff and stakeholders believe they will be unable to provide for the Commission's review its recommendation by the September 15 deadline.

5. On August 19, 2015 the parties requested and the Commission granted a *Motion for Extension* directing the Staff to submit to the Commission with its recommendation regarding changes to the fuel adjustment clause rules by November 20.

6. Staff acknowledges the constructive feedback received from stakeholders thus far, and respectfully requests that the Commission extend the deadline for submission of Staff's recommendation to February 15, 2016 to provide all stakeholders the additional time necessary to collaborate on revisions for Staff's Recommendation.

WHEREFORE, the Staff prays the Commission accept this *Motion for Extension* of *Staff Recommendation* and issue an order extending the submission date for Staff's recommendation no later than February 15, 2016.

Respectfully submitted,

<u>/s/ Hampton Williams</u>

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, electronically mailed, sent by facsimile or hand-delivered to all counsel of record this 4^{th} day of November, 2015.

<u>/s/ Hampton Williams</u>