

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

In the Matter of the Application of)	
Union Electric Company d/b/a)	<u>Case No. ET-2021-0082</u>
Ameren Missouri for Approval of)	Tracking No. YE-2021-0081
Its Surge Protection Program.)	

STAFF MOTION TO LATE FILE EXHIBIT 17

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its *Motion to Late File Exhibit 17* states:

At the evidentiary hearing held April 13, 2021, the judge asked several questions pertaining to the demographics of the customers, which had shown interest in the proposed surge protection device tariff program, of Ameren Missouri witness Steven M. Wills. Staff brought to light a data request response asked by the Office of the Public Counsel, OPC DR1102, which requested copies of the results of customer surveys conducted by Ameren Missouri in regards to a surge tariff program. Staff cross-examined OPC witness, Keri Roth, regarding the surveys and committed to offering the exhibit upon completing its questions of OPC witness Roth. At this time Staff offers the data request response to OPC DR 1102, as attached to this pleading, for admission into the record.

WHEREFORE, Staff respectfully submits its *Motion to Late File Exhibit 17* in this case; and prays the Commission will grant such relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

Senior Counsel

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 14th day of April, 2021, to all counsel of record.

/s/ Whitney Payne