

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

Nancy Hurt,)	
Complainant,)	
)	
v.)	<u>File No. EC-2024-0108</u>
)	
Union Electric Company d/b/a Ameren)	
Missouri,)	
Respondent)	

MOTION FOR EXTENSION OF TIME TO FILE STAFF REPORT

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension of Time to File Staff Report*, states as follows:

1. On September 27, 2023, Complainant Nancy Hurt filed a *Complaint* against Union Electric Company d/b/a Ameren Missouri (hereafter “Ameren Missouri”). She filed an Amendment to her Complaint on October 17, 2023.
2. On September 28, 2023, the Commission issued an *Order Giving Notice of Case Filing, Directing an Answer, A Staff Investigation, and to Cease Disconnection or Restore Service*. In its Order, the Commission directed Ameren Missouri to file an answer or request mediation by October 28, 2023, and Staff to investigate the complaint and file a report with the Commission no later than November 13, 2023.
3. Ameren Missouri filed its *Answer and Affirmative Defenses* on October 26, 2023.
4. Staff has and will continue to issue data requests to aid in its review; however, the parties’ responses to Staff’s initial rounds of data requests have spurred the need for further investigation and additional discovery.

5. Staff requests additional time to review the information provided thus far and determine if further information is needed.

6. To provide sufficient time to conduct further discovery, analyze newly acquired data and information from both parties, and complete its investigation, Staff requests an additional 40 days in which to complete and file its report. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for Ameren Missouri and the Office of the Public Counsel have been contacted regarding this motion, and neither party objects to the granting of an extension of time in this matter.

8. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Motion for Extension of Time to File Staff Report* for the Commission's information and consideration and hereby prays the Commission grant Staff an additional 40 days within which to file its report in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr
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Attorney for Staff of the
Missouri Public Service Commission

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 8th day of November, 2023, to all counsel of record.

/s/ Carolyn H. Kerr