

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

In the Matter of the Petition of Union  
Electric Company d/b/a Ameren Missouri                     )  
for a Financing Order Authorizing the                     )       File No. EF-2024-0021  
Issuance of Securitized Utility Tariff                     )  
Bonds for Energy Transition Costs related                )  
to Rush Island Energy Center.

**MOTION FOR LEAVE TO FILE STATEMENTS OF POSITION OUT OF TIME**

Comes now the Missouri Industrial Energy Consumers ("MIEC") and for its Motion for Leave to File its Statements of Position Out of Time, states as follows:

1. Counsel for MIEC attempted to timely file its Statement of Position on the evening of April 8, but was blocked from EFIS website access, and left messages at that time for EFIS support;
2. On April 9, EFIS support contacted Counsel and advised that EFIS access was blocked for security reasons due to the IP address showing location outside of the United States. EFIS support then changed permissions to allow EFIS access. However, when counsel tried to submit the filing, her EFIS account was locked.
3. On April 10, EFIS support unlocked the account and the Statement of Positions was successfully filed on EFIS.
4. Good cause exists to grant this Motion, because the inability to submit the pleading was due to technical issues with the EFIS system.

WHEREFORE, the MIEC requests that the Commission grant its Motion to File Statement of Positions Out of Time.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia  
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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)), on the Office of the Public Counsel (at [opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)) and on all parties of record on this 10<sup>th</sup> day of April 2024.

/s/ Diana M. Plescia