

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

Adhol W. Deng,)	
)	
Complainant,)	
)	
v.)	<u>File No. GC-2024-0374</u>
)	
Spire Missouri Inc. d/b/a Spire,)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME

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

1. On June 24, 2024, Complainant Adhol W. Deng filed a *Formal Complaint* with the Public Service Commission (“Commission”).
2. On July 1, 2024, the Commission entered an *Order* setting a deadline for Respondent Spire Missouri Inc. d/b/a Spire (“Spire” or “the Company”) to file its Answer and for Staff to file an investigation report or a status report indicating when it expects to file an investigation report. According to that *Order*, Staff’s initial reporting is due August 16, 2024.
3. On August 1, 2024, Spire filed its *Answer and Motion for Partial Dismissal* in this case.
4. Beginning on July 2, 2024, and again on August 2, 2024, Staff submitted several data requests (DRs) to the Spire. The due dates for responses to the most recent data requests sent to Spire are August 22, 2024.

5. Staff requests additional time to review the information provided thus far, obtain and review the information from the remaining data requests, 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 extension until September 20, 2024, 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 Spire 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 until at least September 20, 2024, 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

Missouri Bar # 45718

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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 13th day of August, 2024, to all counsel of record.

/s/ Carolyn H. Kerr