BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of) Union Electric Company, d/b/a Ameren) Missouri, and Platte-Clay Electric Cooperative,) Inc., for an Order Approving the Territorial) Agreement between Ameren Missouri and) Platte-Clay Electric Cooperative, Inc. in Ray) Clinton, Caldwell and Clay Counties, Missouri)

File No. EO-2017-0044

MOTION FOR EXTENSION OF TIME WITHIN WHICH TO COMPLETE INVESTIGATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time Within Which to Complete Investigation*, states as follows:

1. Ameren Missouri, Platte-Clay Electric Cooperative, Inc., and Union

Electric Company filed a joint application on August 16, 2016.

2. Thereafter the Commission ordered Staff to investigate and file a report no later than September 15, 2016.

3. This deadline granted Staff only 30 days to conduct discovery and file its investigative report.

4. Staff sent out data requests on August 26, 2016. Staff has not received all of the responses to those data requests.

5. Staff requests an additional 60 days within which to complete its investigation and file its report.

WHEREFORE, Staff prays that the Commission will grant it an additional 60 days

within which to complete its investigation and file its report; and such other and further

relief as the Commission deems just in the circumstances.

Respectfully submitted,

<u>/s/ Casi Aslin</u>

Casi Aslin Missouri Bar Number 67934 Attorney for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-526-6036 <u>casi.aslin@psc.mo.gov</u>

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 15th day of September, 2016.

<u>/s/ Casi Aslin</u>