

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

Dominic Mikel, )  
 )  
 Complainant )  
 )  
 v. )  
 )  
 Union Electric Company d/b/a Ameren )  
 Missouri, )  
 )  
 Respondent. )

**File No. EC-2025-0139**

**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 October 16, 2024, Pursuant to Commission Rule 20 CSR 4240-2.070, Dominic Mikel (“Complainant”) filed a formal complaint with the Missouri Public Service Commission against Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) with an amount in dispute of less than \$3,000.

2. On November 18, 2024, Ameren Missouri requested mediation in this matter and, on the same day, the Commission ordered the Complainant to respond to the request. Additionally, the Commission ordered all actions in the case to cease and all deadlines to be tolled until further order of the Commission.

3. On November 26, 2024, after no response from the Complainant, the Commission issued an *Order Lifting Tolling of Time Limitations and Deadlines*. In its *Order*, the Commission directed Ameren Missouri to file an answer to the complaint by

December 2, 2024. The Commission further ordered Staff to investigate and file a report by December 16, 2024.

4. On December 2, 2024, Ameren Missouri filed its *Answer*.

5. Staff has propounded data requests to Ameren Missouri and received responses on November 18, 2024. Additional data requests were sent to Ameren Missouri from Staff on December 10, 2024, with a response due date of December 30, 2024. Staff requests additional time to await responses, review the information provided and determine the full content of Staff's report. Staff believes that it will be able to file a report by January 23, 2025, which will allow enough time to receive and process the responses to the additional data requests. Staff will endeavor to file its report earlier, if possible.

6. Mr. Mikel and the Office of the Public Counsel had yet to respond to the extension request prior to the filing of this document. Ameren Missouri has no objection to this request. 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 prays the Commission grant Staff additional time within which to file its report in this matter, on or before January 23, 2025; and to grant such other and further relief as the Commission considers just and reasonable in the circumstance.

Respectfully submitted,

**/s/ Tracy D. Johnson**

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, to the parties of record as listed in the Service List maintained for this case by the Commission's Data Center, on this 12<sup>th</sup> day of December, 2024.

**/s/ Tracy D. Johnson**