

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

In the Matter of the Amendment of the)	
Commission's Rule regarding Applications)	Case No. EX-2018-0189
for Certificates of Convenience and Necessity)	

MOTION TO LATE FILE COMMENTS INSTANTER

COMES NOW Wind on the Wires, by counsel, and hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for leave to file comments out of time pursuant to 4 CSR 240-2.080. In support of this motion, Wind on the Wires states and alleges the following:

1. On May 15, 2018 a copy of the proposed rules for filing requirements for electric utility applications for certificate of convenience and necessity was published in the Missouri Register (vol. 43, num. 10). With the rules was a public notice to submit comments on or before June 14, 2018.
2. Wind on the Wires prepared comments and an accompanying schedule to file on June 14, however, due to issues with Wind on the Wires computer system Wind on the Wires was unable to convert the documents to PDF for filing. The issue did not become apparent until early evening on the 14th, when computer support staff was unavailable to correct the problem.
3. Wind on the Wires' computer support staff was able to correct the problem at approximately 1pm central time on June 15.
4. Wind on the Wires avers that the delay in this filing is not intended to prejudice the rights of any party to this proceeding.
5. Wind on the Wires counsel has not received copies of any comments filed to date

nor reviewed any comments filed to date in this docket prior to preparing its comments.

6. Wind on the Wires submits these comments to provide the Commission a more thorough and complete record upon which to take action in this case.

WHEREFORE, for all the reasons stated herein, Wind on the Wires respectfully requests that its Motion for leave to file the attached documents instanter be granted.

Respectfully submitted,

/s/ Sean R. Brady

Sean R. Brady (IL Bar #: 6271134)

Wind on the Wires
Senior Counsel and
Regional Policy Manager
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Attorney for Wind on the Wires

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AFFIDAVIT OF SEAN R. BRADY

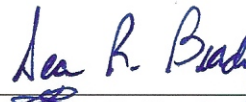
I, Sean R. Brady, being duly sworn, declare under oath as follows:

1. My name is Sean R. Brady. I am Senior Counsel and Eastern Regional Policy Manager for Wind on the Wires. My business address is P.O. Box 4072, Wheaton, Illinois, 60189. I make this affidavit in support of the ***Motion to Late File Comments Instantly*** being submitted in the above captioned docket before the Missouri Public Service Commission on behalf of Wind on the Wires on June 15, 2018.

2. I have personal knowledge of the facts set forth in the motion being filed on behalf of Wind on the Wires.

3. The matters stated therein are true and correct to the best of my knowledge and belief.

Further, affiant sayeth naught.



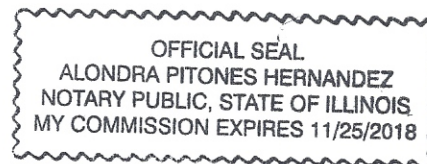
Sean R. Brady

Wind on the Wires
Senior Counsel and Regional Policy
Manager

STATE OF ILLINOIS

COUNTY OF DUPAGE

Subscribed and Sworn or Affirmed before me
this 15th day of June 2018.





Notary Public

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on June 15, 2018.

/s/ Sean R. Brady

Sean R. Brady