BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for an Order Authorizing the Issue and Sale of Additional Long-Term Indebtedness

File No. EE-2025-0084

STAFF REQUEST FOR AN EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and pursuant to the February 6, 2025, *Order Directing Notice and Establishing Time for Responses*, states as follows:

1. On January 17, 2025, Evergy Metro, Inc., d/b/a Every Missouri Metro and

Evergy Missouri West, Inc., d/b/a Evergy Missouri West ("Evergy" or "Applicant") filed its

Application for Variances (Application).

- 2. Evergy requested that the Commission grant waivers from:
 - a. The Commission's rules 20 CSR 4240-13.050(9), 13.055(3)(C) and (D) that requires Evergy to provide a door knock or door hanger at the time of the service disconnection., and
 - Evergy is asking for a variance from 20 CSR 4240-13.050(8) and 20 CSR 4240-13.055(3)(A) and (3)(B) to waive the requirement that the notification must be a phone call.

3. On February 6, 2025, the Commission ordered Staff to file its *Recommendation* no later than March 6, 2025.

4. On February 18, 2025, Staff sent data requests to the Applicant. Responses are due to Staff by March 6, 2025.¹ Since that request Staff has sent Evergy additional data requests.

5. Staff requests that the Commission extend the deadline for its recommendation to May 5, 2025. Staff will proceed as quickly as possible to offer the Commission its recommendation.

WHEREFORE, Staff respectfully requests that the Commission accepts its *request* for an extension of time and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

<u>/s/ Eric Vandergriff</u>

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Staff Counsel for the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 5th day of March, 2025.

/s/ Eric Vandergriff

¹ Evergy requested an extension to respond to some of Staff's data requests until March 12, 2025. Staff granted the Applicant's request.