

**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 Authorization to Enter into a Contract  | ) | <b><u>File No. EM-2025-0243</u></b> |
| with a Third-Party for Utilization of Fiber | ) |                                     |
| Optic Capacity Not Currently Utilized for   | ) |                                     |
| Electric Operations                         | ) |                                     |

**STAFF’S REQUEST FOR ADDITIONAL TIME TO FILE RECOMMENDATION**

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

1. On March 4, 2025, Union Electric Company d/b/a Ameren Missouri filed an application seeking authority to lease two fiber pairs of optic strands over an approximately 15-mile portion of Ameren Missouri’s Clark-Galena transmission line and a waiver request of the 60-day notice requirement contained in Commission Rule 20 CSR 4240-4.017 (the “Application”).

2. On March 5, 2025, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Staff Recommendation*, which set a March 20, 2025, deadline for applications to intervene and which set an April 7, 2025, deadline for Staff to file a Recommendation regarding the Application or a request for additional time (the “Order”).

3. No applications to intervene were filed on or by March 20, 2025.

4. Staff submitted data requests (“DRs”) to Ameren Missouri on March 18, 2025, and March 20, 2025. While responses to those DRs have been received as of the date of this filing, in order to provide sufficient time for Staff to examine

Ameren Missouri's request, including the opportunity to review DR responses and consider the potential need to issue additional discovery in its examination, Staff requests the Commission order Staff to submit its recommendation no later than May 7, 2025. Staff will endeavor to file its recommendation earlier if possible.

5. This Request for Additional Time 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 Request for Additional Time, and respectfully requests the Commission accept the same and order Staff to file its recommendation regarding the Application no later than May 7, 2025, and for such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ Alexandra Klaus**

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**Attorney for the Staff of the  
Missouri Public Service Commission**

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were mailed, electronically mailed, or hand-delivered to all counsel of record on this 7<sup>th</sup> day of April, 2025.

**/s/ Alexandra Klaus**