BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

In the Matter of the Cause of the February 2021 Cold Weather Event and its Impact on Investor Owned Utilities

File No. AO-2021-0264

MOTION FOR ADDITIONAL TIME TO FILE REPORT

The Staff of the Missouri Public Service Commission (Staff), through Staff Counsel's Office, files this request for an additional eight (8) days, until April 30, 2021, to file the report directed by the Commission in this docket and all corresponding dockets¹. In support, Staff states the following:

1. On February 24, 2021, the Commission directed its Regulatory Analysis and Customer Experience Departments, with assistance as needed from other departments within its Industry Analysis and Financial and Business Analysis Divisions, to investigate Missouri's electrical and natural gas utilities' preparation for and response to Missouri's February 2021 extreme cold, and to file a report of the initial findings to the Commission no later than April 22, 2021.

2. The Regulatory Analysis and Customer Experience Departments, and the Industry Analysis and Financial and Business Analysis Divisions, have conducted an investigation to include but not limited to, issuing and reviewing responses to 363 data requests and gathering and analyzing publicly available information. The investigation continues to collect information as it is made available for accuracy and consistency, including review of information presented and made available this week.

¹ See File Nos. EO-2021-0358, EO-2021-0359, EO-2021-0360, EO-2021-0361, GO-2021-0362, GO-2021-0363, GO-2021-0364, GO-2021-0365, GO-2021-0366, GO-2021-0367.

3. In order to ensure that the report(s) provided to the Commission is as concise and as comprehensive as possible, as well as to ensure the proper treatment of information that has been identified as "Confidential" or "Highly Confidential," Staff requests an additional eight (8) calendar days to report its findings to the Commission, and thus to file the report(s) no later than April 30, 2021.

WHEREFORE, the Staff files this request for additional eight (8) days, and thus no later than April 30, 2021, to file the report directed by the Commission, and for such other and further relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Curt Stokes

Curt Stokes Chief Deputy Counsel Mo. Bar. No. 59836 200 Madison St, Ste. 800 P.O. Box 360 Jefferson City, MO 65102 Phone: 573-751-4227 Fax: 573-751-7431 E-mail: <u>curtis.stokes@psc.mo.gov</u>

Jamie S. Myers Associate Counsel Mo. Bar No. 68291 200 Madison St., Ste. 800 Jefferson City, MO 65102 Phone: 573-526-6036 Fax: 573-751-9285 E-mail: jamie.myers@psc.mo.gov

Attorneys for the Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 21st day of April, 2021, to all counsel of record.

<u>/s/ Jamie S. Myers</u>