BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

John Dady and Debora Hoyle,	)	
	)	
Complainants,	)	
	)	
v.	)	**File No. EC-2026-0349**
	)	
Union Electric Company d/b/a Ameren Missouri,	)	
	)	
Respondent.	)	

MOTION FOR EXTENSION OF TIME

COMES NOW, the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Motion for Extension of Time*, states as follows:

1. On June 3, 2026, John Dady and Debora Hoyle (Complainants) filed a complaint with the Commission against Union Electric Company d/b/a Ameren Missouri (Ameren).

2. On June 25, 2026, Ameren Missouri filed a Request for Meditation and Complainants filed a pleading indicating their willingness to participate in mediation.

3. On July 22, 2026, the Commission appointed a mediator, stayed all procedural deadlines, and tolled all time limitations pending completion of the mediation process.

4. On September 15, 2026, Complainants filed an email with the heading *Notice of Mediation Impasse and Motion for Prehearing Conference* (Notice & Motion), stating mediation had failed and requesting a prehearing conference to establish a procedural schedule.

5. On October 5, 2026, the Commission lifted the stay of procedural deadlines and the tolling of time limitations and ordered Staff to investigate the complaint and file its report and recommendations, or a request for an extension of time, no later than November 4, 2026.

6. On October 19, 2026, Complainants filed its *Claimants' Rejection of Satisfaction of Complaint, Objection to Motion to Dismiss, and Renewed Motion to Compel Discovery and Mandatory Physical Line Testing*.

7. On October 30, 2026, Ameren filed a request for a prehearing conference.

8. To provide sufficient time to review responses, conduct further discovery, analyze any newly acquired information, and complete its investigation, Staff requests at least an additional 50 days in which to complete and file its recommendation. Staff intends to file its report and recommendations, or a status update and request for further extension of time, by December 23, 2026.

9. 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 its recommendation and hereby prays the Commission grant Staff until December 23, 2026, to file its recommendation or alternative pleading in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Ray Cunneen

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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 3rd day of November, 2026, to all counsel of record.

/s/ Ray Cunneen