

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

In the Matter of the Application of EDF Energy)
Services, LLC for Certification as a Seller of) **File No. GA-2017-0340**
Energy Services in the State of Missouri)

**STAFF MOTION FOR EXTENSION OF TIME
TO FILE RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission and for its Motion for Extension of Time to File Recommendation (“Motion”) states as follows:

1. Staff’s first Motion for Extension of Time to File Recommendation, filed herein on June 27, 2017, stated in part as follows:

5. Based on EDF’s application it is impossible to determine exactly what “energy services” EDF proposes to provide or where (upstream or downstream of city-gate) it proposes to provide those “energy services.” Therefore, **Staff needs additional time to conduct discovery and analyze EDF’s responses before providing a recommendation in this matter.** Given that the Commission’s rule governing discovery, 4 CSR 240-2.090(2) provides parties twenty (20) days to answer data requests, at this time Staff believes it will need an additional forty-five (45) days to prepare and file its recommendation in this matter.
6. EDF’s application contains no evidence that it is properly registered to do business in the state of Missouri. In addition, 4 CSR 240-3.285 requires gas sellers seeking certification pursuant to 393.297 - 393.302, RSMo, to provide a list of each political subdivision in which it sells gas; however, EDF’s application contains a list of LDC service territories in which it plans to potentially serve rather than a list of political subdivisions. (Emphasis added)

2. Based on the above, the Commission extended the time for Staff to file a recommendation in this matter to August 14, 2017.

3. On July 6, 2017, Staff submitted four (4) data requests to EDF, responses to which were originally due July 26, 2017. This would have allowed sufficient time for Staff to analyze EDF's responses and prepare and file a recommendation on August 14, 2017.

4. However, to date Staff has received no responses to the four (4) data requests submitted to EDF on July 6, 2017. Therefore, Staff is unable to file a recommendation on August 14, 2017.

5. Without knowing when, or if, EDF will respond to the outstanding data requests it is difficult to state when Staff will be able to file its recommendation in this matter; however, Staff requests until September 14 to file either a status report or recommendation in this matter.

WHEREFORE, Staff moves the Commission for an order granting Staff until September 14, 2017, to file either a status report or recommendation regarding EDF's application.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 11th day of August, 2017.

/s/ Jeffrey A. Keevil