

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

In the Matter of the Cancellation of the Certificate of)
Convenience and Necessity Originally Approved in) File No. ED-2019-0309
File No. EA-2005-0180 and the LTS Rate Schedule)

MOTION FOR EXTENSION TO FILE RESPONSE

COMES NOW the Office of the Public Counsel (“OPC”), the Missouri Industrial Energy Consumers (“MIEC”), and the Midwest Energy Consumers Group (“MECG”) (collectively referred to as the “Consumers”) and for their Motion for Extension to File Response respectfully state as follows:

1. On June 5, 2019, the Consumers filed their Motion for Hearing in the above captioned docket. On June 17, 2019, Ameren and the Staff both filed responses in opposition to the Consumers’ motion. Ameren’s response consists of 10 pages, while Staff’s response consists of 33 pages as well as an 8 page affidavit.

2. On June 19, the Commission issued its order directing the Consumers to file their response to the Ameren and Staff pleadings by Thursday, June 27.

3. Through this pleading the Consumers request an extension until Tuesday, July 2, 2019 to file its response. As indicated, Staff’s pleading alone consists of 33 pages with references to dozens of appellate and Commission cases. In addition, Staff’s pleading includes an affidavit setting forth several facts and conclusions that will need to be responded to.

4. By granting this extension, the Consumers do not believe that they will prejudice any party to this case. Indeed, this case does not carry an operation of law date requiring action by a certain date. Furthermore, the Consumers’ response will still be

available in the event that the Commission conducts an agenda session and desires to consider this matter on Wednesday, July 3.

5. Finally, the Consumers wish to point out that the Commission has previously granted extensions to other parties in order to allow them sufficient time to consider the matters in this case. Specifically, while initially ordered to file its recommendation on June 12, the Staff subsequently sought, and was granted, an extension until June 17.

WHEREFORE, the Consumers respectfully request that the Commission grant it an extension until July 1 to file its response in this matter.

Respectfully submitted,

WOODSMALL LAW OFFICE

 /s/ David Woodsmall
David L. Woodsmall, #40747
308 East High Street, Suite 204
Jefferson City, Missouri 65101
(573) 797-0005
david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP

OFFICE OF THE PUBLIC COUNSEL

 /s/ Marc Poston
Marc Poston, #45722
Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102
(573) 526-4975
marc.poston@ded.mo.gov

BRYAN CAVE LEIGHTON PAISNER LP

 /s/ Lewis Mills
Lewis R. Mills, #35275
221 Bolivar Street, Suite 101
Jefferson City, Missouri 65101
(573) 556-6627
lewis.mills@bcplaw.com

ATTORNEY FOR THE MISSOURI
INDUSTRIAL ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall". The signature is written in a cursive style with a large initial "D".

David L. Woodsmall

Dated: June 21, 2019