## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Noranda Aluminum, Inc., et al.,

Complainants,

VS.

Union Electric Company doing business As Ameren Missouri, Case No. EC-2014-0224

Respondent.

## Staff's Motion for Extension of Time to File Briefs And for Expedited Treatment

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the Chief Staff Counsel, and for its *Motion to Shorten the Time to Respond to Discovery*, states as follows:

1. Noranda Aluminum Company and thirty-seven other electric customers ("Complainants") of Ameren Missouri filed their *Complaint* on February 12, 2014, commencing Case No. EC-2014-0224.

2. The Commission convened a hearing on the *Complaint* on June 16 and 17, 2014.

3. Pursuant to the *Order Modifying Procedural Schedule* issued on April 23, 2014, the initial briefs are due herein on July 3, 2014, and the reply briefs are due on July 14, 2014.

4. Due to the press of other business, Staff would like to extend these dates as follows: initial briefs to be due on July 8, 2014, and reply briefs to be due on July 17,

2014. In further support of its request, Staff notes that the issues presented are numerous and complex – not to say novel, and the record is extensive. The existing procedural schedule is unusually aggressive in that the initial briefs are due only 12 days after the hearing and the reply briefs are due only 11 days after that.

5. Staff has polled all of the other parties as to this proposed extension and only the Complainants have expressed objections; and their objection is only to the extension of the date for the reply briefs.

6. Staff prays that the Commission will take up and determine this motion in expedited fashion in that the initial briefs are presently due the day after tomorrow.

WHEREFORE, Staff prays that the Commission will expeditiously take up and grant Staff's motion and extend the due date for the initial briefs herein to July 8, 2014, and for the reply briefs to July 17, 2014; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

<u>/s/ Kevin A. Thompson</u> **KEVIN A. THOMPSON** Missouri Bar Number 36288 Chief Staff Counsel

Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-6514 (Voice) 573-526-6969 (Fax) kevin.thompson@psc.mo.gov

Attorney 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, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 1<sup>st</sup> day of July, 2014, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

## /s/ Kevin A. Thompson