

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

Darleen A. Hall,)	
Complainant,)	
)	
v.)	<u>Case No. EC-2015-0123</u>
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
Respondent.)	

**STAFF RESPONSE TO AMEREN MISSOURI’S MOTION
TO DISMISS IN LIEU OF STAFF REPORT**

COMES NOW the Staff of the Missouri Public Service Commission and for its *Response to Ameren Missouri’s Motion to Dismiss In Lieu of Staff Report* (“Response”) respectfully states as follows:

1. This case was formally initiated on November 17, 2014, when Complainant filed a Complaint with the Commission against Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Ameren”).

2. Pursuant to Commission order, Ameren filed its *Answer* herein on December 22, 2014. Included with said *Answer* was a *Motion to Dismiss* by Ameren.

3. In its *Motion to Dismiss*, Ameren stated in paragraph 7 that

** [REDACTED]

[REDACTED]

[REDACTED]

1 ** [REDACTED] **

2 ** [REDACTED] **

[REDACTED] ** and in paragraph 8 that ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **

4. Staff is aware that 4 CSR 240-2.070(15)(D) provides in part that “Staff shall not advocate a position beyond reporting the results of its investigation” in small formal complaint cases, and that this case has been designated as such by the Commission’s *Notice of Small Complaint and Order Directing Staff to Investigate and File a Report* issued on November 20, 2014. However, Staff can report that ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **

5. According to the *Order Granting Staff’s Request for Additional Time to File Recommendation* issued herein on December 8, 2014, Staff is to file its report in this case no later than January 12, 2015. However, for the reasons set forth above, Staff requests that this Response be accepted in lieu of a report and that Staff be relieved of the obligation to file any further report herein.

3 ** [REDACTED] **

WHEREFORE, Staff respectfully requests that the Commission accept this *Response to Ameren Missouri's Motion to Dismiss In Lieu of Staff Report* and that Staff be relieved of the obligation to file a further report herein.

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 all parties of record this 30th day of December, 2014.

/s/ Jeffrey A. Keevil