

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

Brett Felbert and Lisa Lambert,)	
)	
Complainants,)	<u>Case No. EC-2026-0218</u>
)	
v.)	
)	
Union Electric Company d/b/a Ameren Missouri,)	
)	
Respondent.)	

MOTION FOR CLARIFICATION AND EXTENSION

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

1. On March 5, 2026, Brett Felber and Lisa Lambert, (“Complainants”) filed a complaint against Union Electric Company, d/b/a Ameren Missouri (“Ameren”).
2. On March 9, 2026, the Commission entered an order directing Ameren to file its response by April 8, 2026; and for Staff to file a report or alternative pleading no later than May 11, 2026.
3. On April 8, 2026, Ameren Missouri filed an Answer, Grounds of Defense, and Motion to Dismiss.
4. On April 10, 2026, the Commission entered an order directing Complainants and any other party wishing to respond, to file no later than April 20, 2026.
5. To date, the Commission has yet to rule on Ameren’s motion to dismiss. Staff is unopposed to this motion at this time.

6. After review of the original complaint, subsequent pleadings, responses, and information obtained through data requests, Staff requests the Commission order Complainants to file a supplemental pleading and supporting documents specifically identifying the amount in controversy relevant to this complaint and provide clarification on any outstanding issues properly before the Commission.

7. Further, Staff requests the Commission grant an extension for the filing of its report in this matter. Staff requests the Commission issue an order setting the filing date for its report to be thirty (30) days after the date Complainants' clarification filing is due.

8. The requested clarification and extension will provide Staff with time to review responses, conduct further discovery, analyze any newly acquired information, complete its investigation, and file its report.

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 Clarification and Extension*; and hereby prays the Commission issue an order granting the relief requested herein; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Ray Cunneen

Ray Cunneen

Missouri Bar No. 77925

Legal Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-526-0896

Ray.Cunneen@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 by electronic mail, or First-Class United States Postal Mail, postage prepaid, on this 11th day of May 2026, to all counsel of record.

/s/ Ray Cunneen