

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

In the Matter of Union Electric Company d/b/a)
AmerenUE's Tariffs to Increase Its Annual) Case No. ER-2008-0318
Revenues for Electric Service)

**STAFF'S MOTION FOR EXTENSION OF TIME TO FILE THE
LIST AND SCHEDULE OF ISSUES AND ORDER OF WITNESSES,
CROSS-EXAMINATION, AND OPENING STATEMENTS, AND
THE FINAL RECONCILIATION AND STATEMENTS OF POSITION**

Comes now the Staff of the Missouri Public Service Commission (Staff) and, for its motion for extension of time to file the List And Schedule Of Issues, Order Of Witnesses, Cross-Examination, And Opening Statements to Wednesday, November 12, 2008, and the Final Reconciliation and Statements Of Position to Thursday, November 13, 2008, states as follows:

1. By Order dated May 29, 2008 the Commission generally adopted the procedural schedule jointly proposed by the parties. In that schedule the List And Schedule Of Issues, And Order of Witnesses, Cross-Examination, And Opening Statements are due on Monday, November 10, 2008, and the Final Reconciliation and the parties' Statements of Position are due on Wednesday, November 12, 2008.

2. Due to the press of other matters, in this case as well as other cases pending before the Commission, Commission cases in other forums, the filing of surrebuttal testimony in this case on November 5, 2008, and working with multiple parties that have their own time constraint problems, the Staff requires additional time to submit a list and schedule of issues, order of witnesses, cross-examination and opening statements, a final reconciliation, and a statement of positions. The Staff needs additional time although it has worked diligently on these matters and will continue to work on these matters on Tuesday, November 11, 2008, which is Veterans' Day, a state holiday .

3. In light of the foregoing, the Staff requests that the Commission extend the filing date of the List And Schedule Of Issues, And Order of Witnesses, Cross-Examination, and Opening Statements to Wednesday, November 12, 2008 and the filing date of the Final Reconciliation and parties' Statements of Position to Thursday, November 13, 2008.

4. The undersigned counsel apologizes for any inconvenience this delay has caused or may cause the Commission and the Regulatory Law Judge.

Wherefore, the Staff, for good cause shown, moves the Commission to extend the ordered filing date for the List And Schedule Of Issues, And Order of Witnesses, Cross-Examination And Opening Statements from Monday, November 10, 2008 to Wednesday, November 12, 2008 and the ordered filing date for the Final Reconciliation and parties' Statements of Position from Wednesday, November 12, 2008, to Thursday, November 13, 2008.

Respectfully submitted,

/s/ Steven Dottheim

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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 counsel of record this 10th day of November, 2008.

/s/ Steven Dottheim