

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

In the Matter of an Investigation Into)
An Incident in December 2005 at the)
Taum Sauk Pumped Storage Project)
Owned and Operated by the Union)
Electric Company, doing business as)
AmerenUE.)

Case No. ES-2007-0474

**STAFF'S MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO FILE ITS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through the Commission's General Counsel, pursuant to §§ 386.071 and 386.390.1, RSMo 2000, and Commission Rule 4 CSR 240-2.070(1), and for its Motion for an Extension of Time Within Which to File its Initial Report of its Investigation into the Taum Sauk Incident, states as follows:

1. This matter concerns the circumstances of the collapse of the Upper Reservoir Dam at the Taum Sauk Pumped Storage Project on December 14, 2005.

2. Staff moved to open this investigation on June 8, 2007, requesting the Commission to "open an investigatory docket in order to determine whether UE's electric plant and operational practices are safe and adequate and, after due consideration of the competent and substantial evidence of record therein, make such order or orders as will best protect the public interest, whether to direct the General Counsel to file a complaint before the Commission or elsewhere, or to refer the matter to another agency or agencies, or to make some other appropriate disposition thereof."

3. The Commission granted Staff's motion over AmerenUE's objection on June 19, 2007, stating: "The Commission has reviewed Staff's request and AmerenUE's response and, finding it reasonable to open this investigation, will do so for the purpose of receiving an Incident Report. Staff's request to open a contested case docket will be denied." The Commission directed its Staff to file a report not "later than 120 days from the date of this order," that is, by October 17, 2007.

4. The Commission convened an evidentiary hearing on July 24, 2007, which continued on July 25, August 1, 2, 3, 13, 14, 16, and 17. The Commission heard the testimony of 13 witnesses, recorded in over 2,500 pages of transcript, and received 60 exhibits.

5. Staff's resources have been fully committed to a wide variety of other cases, including the Missouri-American Rate Case, the Kansas City Power & Light Rate Case, and many others.

6. Due to both the press of other business and the magnitude of the record herein, Staff requires additional time to finalize its analysis of more than 2,500 pages of testimony in the hearing transcript.

WHEREFORE, on account of all the foregoing, Staff prays that the Commission will grant it an extension of time, up to and including October 24, 2007, within which to complete its report herein; and grant such other and further relief as is just in the circumstances.

Respectfully Submitted,

/s/ KEVIN A. THOMPSON

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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 **17th day of October, 2007**, as set out below:

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