

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

FILED
OCT 21 1996
MISSOURI
PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union Electric Company)
for an Order Authorizing: (1) Certain Merger Transactions)
Involving Union Electric Company; (2) the Transfer of Certain)
Assets, Real Estate, Leased Property, Easements and)
Contractual Agreements to Central Illinois Public Service)
Company; and (3) In Connection Therewith, Certain Other)
Related Transactions.)

Case No. EM-96-149

**MOTION IN SUPPORT OF STAFF'S MOTION
FOR EXTENSION OF TIME**

COMES NOW the Office of the Public Counsel ("Public Counsel") and requests that the Public Service Commission ("Commission") extend the filing date for the submission of market power testimony by all parties from November 1, 1996 to November 26, 1996, which latter date is the Tuesday of Thanksgiving Day week. In support thereof, Public Counsel states as follows:

1. Like the Staff, Public Counsel hopes to use a consultant to address the questions posed in the Commission's Order Requesting Additional Information. Given the complexity of this issue, Public Counsel believes that the Commission will be best served by hearing from a consultant that has more experience in this area than does Public Counsel's staff.

2. Unfortunately, the consultant chosen by Public Counsel for its experience in this area will be unable to submit testimony unless an extension until at least around November 25, 1996. Of course, if the Commission decides not to extend the filing date, Public Counsel will submit testimony by in-house expert(s), but this testimony will be less extensive and less useful to the Commission than would testimony by the chosen consultant.

3. Public Counsel would like to use as much of its limited budget as possible on the production of this testimony by its consultant. To that end, Public Counsel respectfully requests that

the Commission clarify its Order Requesting Additional Information by stating whether the Commission desires (or will allow) the filing of responsive testimony and the appearance of the witnesses filing testimony at a supplemental hearing. If the Commission can state whether or not additional testimony and an appearance at a hearing will be required, Public Counsel will be able to more appropriately budget the amount it can spend on the testimony responsive to the Commission's September 25, 1996 Order.

WHEREFORE, Public Counsel respectfully requests that the Commission grant an extension for the filing of testimony until November 25, 1996, and clarify whether additional testimony will be allowed and whether appearance at a hearing will be required.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been either mailed or hand-delivered to the following counsel of record on this 21st day of October, 1996:

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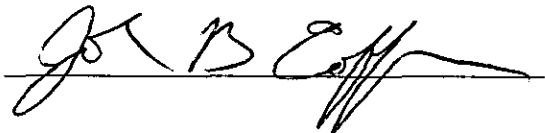
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A handwritten signature in black ink, appearing to read "J M Fischer", written over a horizontal line.