

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

OCT - 1 2001

Missouri Public
Service Commission

In the Matter of the Application of Union)
Electric Company d/b/a AmerenUE for an)
Order Authorizing It to Withdraw from)
the Midwest ISO to Participate in the)
Alliance RTO)

Case No. EO-2001-684

MOTION FOR LEAVE TO FILE OUT OF TIME

COMES NOW the Office of the Public Counsel (Public Counsel) and states as follows:

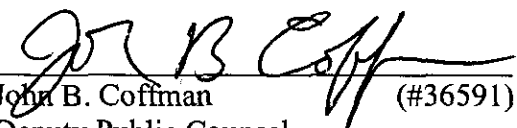
1. Pursuant to the Commission's Order Adopting Procedural Schedule, a List of Issues was due by September 26, 2001 and each party was required to file position statements by Friday, September 28, 2001.

2. Despite a good faith effort, the parties failed to complete a mutually acceptable List of Issues until September 28. As a result, Public Counsel was unable to complete its Position Statements on this List of Issues until today.

WHEREFORE, Public Counsel respectfully requests that the Commission grant leave to file its Position Statements in this case out of time.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 1st day of October 2001:

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