

FILED

SEP 24 2001

September 21, 2001

Missouri Public
Service Commission



VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: MPSC Case No. EC-2002-112

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Motion For Extension of Time In Which to File Answer.**

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Cook", written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/dhb
Enclosures

cc: Parties on Attached Service List

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 24 2001

Sterling Moody, Sterling's Market Place
And Sterling's Place, I

Complainants,

vs.

AmerenUE, Union Electric Co. d/b/a
AmerenUE; and Mike Foy, Leroy Ettling,
And Sherry Moschner, as employees of
AmerenUE.

Respondents.

Missouri Public
Service Commission

Case No. EC-2002-112

MOTION FOR EXTENSION OF TIME IN WHICH TO FILE ANSWER

COMES NOW Union Electric Company d/b/a AmerenUE ("Company" or "Respondents") and pursuant to 4 CSR 240-2.050(3)(A), respectfully requests the Missouri Public Service Commission ("Commission") to grant it a 30-day extension of time in which to file its answer to the Complaint in this case. In accordance with this request, the Company states as follows:

1. On August 21, 2001, the Complainants filed its Complaint with the Commission.
2. On September 4, 2001, the Commission issued its Notice of Complaint.
3. On September 20, 2001, Respondents submitted its Request for Mediation.
4. Pursuant to 4 CSR 240-2.070(7), AmerenUE must file its answer to said Complaint on or before October 4, 2001.
5. According to the Notice of Complaint, if the Complainants decline the opportunity to seek mediation, AmerenUE will be notified of the date by which an answer or notice of satisfaction must be filed, which may be the remainder of the original 30-day period.

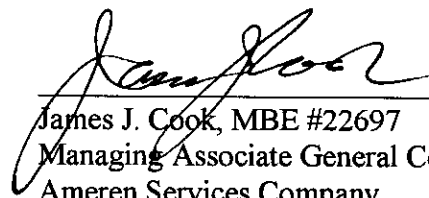
6. AmerenUE fully intends to file an answer to the Complaint if the Complainants decline the opportunity to seek mediation. However, due to the complexity of the claims made by Complainants, an additional thirty (30) days within which to respond to said Complaint will provide Company the opportunity to submit a more thoroughly researched and complete response.

WHEREFORE, for the foregoing reasons, Union Electric Company d/b/a AmerenUE hereby requests an additional thirty (30) days within which to respond to the Complaint if the Complainants decline the opportunity to seek mediation.

September 21, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY



James J. Cook, MBE #22697
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CERTIFICATE OF SERVICE

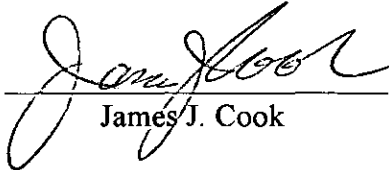
I hereby certify that a copy of the foregoing was served via U.S. first-class mail on this 21st day of September, 2001, on the following parties of record:

CASE NO. EC-2002-112

Office of the Public Counsel
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Jefferson City, MO 65102

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Missouri Public Service Commission
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Jefferson City, MO 65102

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James J. Cook