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

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In the Matter of the Tariff Filings of Union Electric Company, d/b/a Ameren Missouri, to Increase Its Revenues for Retail Electric Service.

Case No. ER-2011-0028

## MOTION FOR ONE-DAY EXTENSION OF TIME TO FILE STATEMENTS OF POSITION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), by and through counsel, and on behalf of itself and the other parties to this case, hereby requests a one-day extension of time to file Statements of Position, and in support of this request, states as follows:

1. The list of issues to be heard, order of witnesses, and order of cross-examination was originally due to be filed on Tuesday, April 19, 2011, but with leave of the Regulatory Law Judge, a one-day extension to Wednesday, April 20, 2011 was granted. Despite the diligent efforts of the Staff and the other parties, the Staff found it necessary to request leave to file said list one additional day later, on Thursday, April 21, 2011.

2. The procedural order entered by the Commission provides that Statements of Position were to be due on Thursday, April 21, 2011, which was to have been two days after the list of issues was finalized. However, due to the above-mentioned delays the Statements of Position are now due on the same day that the list of issues will be finalized.

3. In order to have a minimally adequate amount of time to properly prepare Statements of Position that will aid the Commission in understanding the parties' positions on the issues, we respectfully request a one-day extension of time, to Friday, April 22, 2011, for all parties to file their Statements of Position.

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4. The undersigned counsel for Ameren Missouri has communicated with counsel

for all of the other parties in this case, none of whom have expressed any opposition to this

Motion, with counsel for the following parties indicating that they support it:

Staff MEG MoDNR MIEC AARP/CCM OPC MEUA MRA

WHEREFORE, Ameren Missouri, on behalf of all of the parties, respectfully requests a one-day extension of time, to Friday, April 22, 2011, for the parties to file their Statements of Position.

## /s/ James B. Lowery

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was served via e-mail on counsel of record for all parties of record in this case, on this 21st day of April, 2011.

<u>/s/James B. Lowery</u> James B. Lowery