

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

In the Matter of Union Electric Company, d/b/a) AmerenUE's Tariff to Increase Its Annual) Revenues for Electric Service.)	<u>Case No. ER-2011-0028</u> <u>Tariff No. YE-2011-0116</u>
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STAFF'S MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time*, states as follows:

1. On November 10, 2010, the Commission issued its *Order Adopting Procedural Schedule and Establishing Test Year*.

2. That Order set April 19, 2011, as the date upon which "The parties shall agree upon and Staff shall file a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which they will be called, and the order of cross-examination for each witness. The list of issues should be detailed enough to inform the Commission of each issue that must be resolved. The Commission will view any issue not contained in this list of issues as uncontested and not requiring resolution by the Commission."

3. That Order set April 20, 2011, as the date upon which Staff would file its Reconciliation.

4. Staff is unable to comply with the above-stated requirements of the Order of November 10, 2010. Neither the Joint List of Issues nor the Reconciliation are ready for filing at this time. The reason for this delay is ongoing settlement discussions among the parties which have necessarily consumed significant time and also led to uncertainty as to the precise elements to include in the Joint List of Issues and the Reconciliation.

5. Staff regrets this delay and advises the Commission that the Joint List of Issues and Reconciliation will be filed, together with the Position Statements of the Parties, tomorrow, April 21, 2011.

WHEREFORE, Staff prays that the Commission will grant it an extension of time and allow the Joint List of Issues and the Reconciliation to be filed together with the Position Statements of the several parties tomorrow, April 21, 2011; and grant such other and further relief as the Commission deems just.

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 **20th day of April, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson