

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

Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
vs.)	File No: EC-2016-0104
)	
Union Electric Company, d/b/a Ameren Missouri,)	
)	
Respondent.)	

MOTION FOR CONTINUANCE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Motion for Continuance, states as follows:

BACKGROUND

1. On November 6, 2015, the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) filed its Complaint (“Complaint”) against Ameren Missouri, alleging failure to comply with 4 CSR 240-13.045(5).
2. The Commission issued an order that same day requiring Ameren Missouri to respond to the Complaint no later than December 4, 2015.
3. Ameren Missouri and Staff have reached an agreement, in principal, to resolve this matter and need additional time to formalize and finalize that agreement.
4. Ameren Missouri requests a continuance from the date of December 4, 2015 to December 11, 2015, to either file a formal Stipulation and Agreement signed by the Company and Staff, or to file its Answer in this case.
5. Ameren Missouri’s counsel has been notified by Staff’s counsel that they have no objection to this request for an extension.

WHEREFORE, Ameren Missouri respectfully requests that the Commission issue an Order allowing the Company an additional week, until December 11, 2015, to file a response to

the Complaint filed in this case.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, # 60261
Director & Assistant General Counsel
Matthew R. Tomc, #66571
Corporate Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1310
St. Louis, MO 63103
(314) 554-3484 (phone)
(314) 554-4673
(314) 554-4014 (fax)
AmerenMOService@ameren.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the parties of record on the 4th day of December, 2015.

/s/Wendy K. Tatro

Wendy K. Tatro