

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

In the Matter of the Application of                   )  
Union Electric Company for Authority           )  
To Continue the Transfer of                    )  
Functional Control of Its Transmission        )  
System to the Midwest Independent            )  
Transmission System Operator, Inc.            )

Case No. EO-2008-0134

**MOTION FOR EXTENSION OF TIME TO FILE STATUS REPORT**

COMES NOW Union Electric Company d/b/a AmerenUE (Company or AmerenUE), and hereby requests an extension of time to file the status report called for by paragraph 15 of the Stipulation and Agreement approved by the Commission in this docket. In support of its Motion, AmerenUE states as follows:

1. On September 9, 2008, the Commission approved a Stipulation and Agreement between AmerenUE, the Staff of the Commission, the Office of the Public Counsel, the Midwest Independent Transmission System Operator, Inc. (Midwest ISO), and the Missouri Industrial Energy Consumers respecting AmerenUE's continued participation in the Midwest ISO.

2. Paragraph 15 of the Stipulation and Agreement provides that AmerenUE will provide a status report respecting the progress of discussions with the Midwest ISO regarding the risks outlined in paragraph 12 of the Stipulation and Agreement. This status report was due to be filed and provided to the Stakeholders (as defined in the Stipulation and Agreement) by December 1, 2008.

3. Given commitments to the Company's current rate case (which as the Commission knows began November 20 and will not end until December 12), the undersigned counsel for AmerenUE, who handled this docket for the Company, has been unable to consult

with all of the Company personnel necessary to compile the information needed for the status report.

4. Given these rate case commitments, the Company requests the Commission extend the due date for the status report to Monday, December 22, 2008. The Company would note that the Midwest ISO stakeholder process mentioned in paragraph 12 of the Stipulation and Agreement is not yet complete, and that process did not start as early as the Midwest ISO originally planned. It is thus possible the Company might have more to report by December 22 than it could report at this time.

WHEREFORE, AmerenUE respectfully requests that the Commission grant it an extension of time to December 22, 2008 to file the above-referenced status report.

Dated: November 30, 2008.

Respectfully submitted,

**SMITH LEWIS, LLP**

By: /s/ James B. Lowery  
James B. Lowery, #40503  
Suite 200, City Centre Building  
111 South Ninth Street  
P.O. Box 918  
Columbia, MO 65205-0918  
Phone (573) 443-3141  
Facsimile (573) 442-6686  
[lowery@smithlewis.com](mailto:lowery@smithlewis.com)

**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMERENUE**

**UNION ELECTRIC COMPANY,  
d/b/a AmerenUE**

**Steven R. Sullivan**, #33102  
Sr. Vice President, General Counsel &  
Secretary  
**Thomas M. Byrne**, #33340  
Managing Associate General Counsel  
1901 Chouteau Avenue, MC-1310  
P.O. Box 66149, MC-131  
St. Louis, Missouri 63101-6149  
(314) 554-2514 (Telephone)  
(314) 554-4014 (Facsimile)  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties, on the 30<sup>th</sup> day of November 2008, as follows:

Office of the General Counsel  
Missouri Public Service Commission  
Governor Office Building, 8<sup>th</sup> Floor  
Jefferson City, MO 65101

[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Lewis Mills  
Office of the Public Counsel  
Governor Office Building, 6<sup>th</sup> Floor  
Jefferson City, MO 65101

[Lewis.mills@ded.mo.gov](mailto:Lewis.mills@ded.mo.gov)

Karl Zobrist  
Roger Steiner  
4520 Main Street, Suite 1100  
Kansas City, MO 64111

[kzobrist@sonnenschein.com](mailto:kzobrist@sonnenschein.com)

Dean L. Cooper  
Brydon, Swearengen & England P.C.  
P.O. Box 456  
Jefferson City, MO 65102

[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

Paul Boudreau  
312 E. Capitol Avenue  
Jefferson City, MO 65101  
[paulb@brydonlaw.com](mailto:paulb@brydonlaw.com)

Curtis D. Blanc  
1201 Walnut, 20<sup>th</sup> Floor  
Kansas City, MO 64106  
[Curtis.blanc@kcpl.com](mailto:Curtis.blanc@kcpl.com)

Diana Vuylsteke  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
[dmvuylsteke@bryancave.com](mailto:dmvuylsteke@bryancave.com)

David Linton  
424 Summer Top Lane  
Fenton, MO 63026  
[djlinton@charter.net](mailto:djlinton@charter.net)

**/s/ James B. Lowery**

James B. Lowery