

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED**  
MAY - 7 1996  
MISSOURI  
PUBLIC SERVICE COMMISSION

In the matter of the application of Union )  
Electric Company for an order authorizing: )  
(1) certain merger transactions involving )  
Union Electric Company; (2) the transfer of )  
certain assets, real estate, leased property, )  
easements and contractual agreements to )  
Central Illinois Public Service Company; and )  
(3) in connection therewith, certain other )  
related transactions. )

Case No. EM-96-149

**MOTION FOR LEAVE TO LATE FILE TESTIMONY**

COMES NOW The Office of the Public Counsel ("Public Counsel") and for its  
Motion For Leave To Late File Testimony states as follows:

1. Due to the length of the testimony, the number of witnesses filing, and the added  
complication of preparing public, highly confidential, and proprietary sets, Public Counsel  
was unable to file all testimony by the 3:00 P.M. deadline. One witness's testimony was filed  
after 3:00 P.M. but before 5:00 P.M. on the due date.

2. Public Counsel does not believe that this slight delay will harm any of the parties  
to the proceeding, nor unduly inconvenience the Commission.

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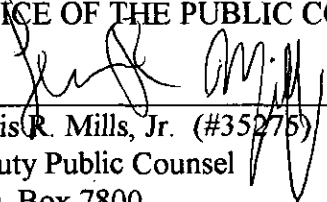
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WHEREFORE, Public Counsel respectfully requests that the Commission grant leave to file one witness's testimony on the due date but after the 3:00 P.M. deadline.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By

  
Lewis R. Mills, Jr. (#35275)

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### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following on this 1<sup>st</sup> day of May, 1996:

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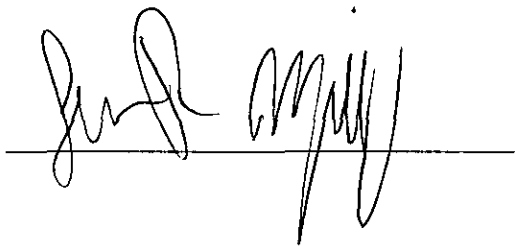
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A handwritten signature in cursive script, appearing to read "Daniel R. Devereaux", is written over a horizontal line.