

In the Matter of the Application of Kansas City
Power & Light Company and KCP&L Greater
Missouri Operations Company for the issuance
of an Accounting Authority Order relating
to their Electrical Operations and for a Contingent
Waiver of the Notice Requirement of
4 CSR 240-4.020(2).

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and pursuant to 4 CSR 240-2.080(13) and (14) hereby respectfully requests that the time to respond to the Midwest Energy Consumer Group et al.’s (“MECG”) *Motion for Reconsideration and Motion for Expedited Treatment* be extended to 5:00 p.m., Tuesday, February 4, 2014, and requests expedited treatment of this request. In support hereof, Ameren Missouri states as follows:

1. Late in the day on January 31, 2014, MEEG, joined by the Staff of the Commission (“Staff”) and the Missouri Industrial Energy Consumers (“MIEC”), filed the above-referenced motion asking the Commission to reconsider the Regulatory Law Judge’s ruling respecting the admissibility into evidence of a brief filed by Ameren Missouri in another case. Shortly thereafter, the Regulatory Law Judge issued an order by delegation setting February 3, 2014 as the deadline for response to the above-referenced motion. The undersigned counsel became aware of the Regulatory Law Judge’s delegation order on Sunday afternoon, February 2, 2014.

2. The undersigned counsel for Ameren Missouri is scheduled to be out of town on client business all day on February 3, 2014, and will not be in his office at all on that date as he will be leaving Columbia at approximately 6:00 a.m. to travel to St. Louis. While the

undersigned counsel has not had the opportunity to review the motion in detail, it is apparent that MECG et al. cites several sources of authority that they claim supports their arguments, none of which the undersigned counsel has had the opportunity to review or evaluate.

3. The Company respectfully suggests that basic principles of fairness suggest that the Company should be afforded more than one business day to first, examine MECG et al.'s motion and the authorities cited to determine what response, if any, is warranted, and second, to prepare and file an appropriate response. The Company therefore requests an additional day to respond, particularly given that MECG's motion consists of eight pages and relies on several authorities and, as it states, took counsel for the other parties three days to research, prepare and file. The Company also requests this additional time given the undersigned counsel's other, pre-existing commitments on February 3 and the timing of the filing of the motion late in the day on Friday, January 31. The Company does not make this request to prejudice any other party.

4. The Company also requests expedited treatment of this request, as it was filed as soon as it could have been under the circumstances.

WHEREFORE, Ameren Missouri respectfully requests that it be given until 5:00 p.m., Tuesday, February 4, 2014, to respond the MECG et al.'s above-referenced motion.

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery
James B. Lowery, #40503
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
(573) 443-3141
(573) 442-6686 (fax)
lowery@smithlewis.com

Thomas M. Byrne, Mo. Bar No. 33340
Director – Assistant General Counsel
Ameren Services Company

1901 Chouteau Avenue (MC 1310)
St. Louis, MO 63103
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-2514
(314) 554-4014 (fax)
tbyrne@ameren.com

Attorneys for Ameren Missouri

Dated: February 2, 2014

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Ameren Missouri's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 2nd day of January, 2014, on:

Staff of the Missouri Public Service Commission
Governor Office Building
PO Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65102
opc@ded.mo.gov

James M. Fischer
Larry W. Dority
Fischer & Dority P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfischerpc@aol.com
lwdority@sprintmail.com

Roger Steiner
Kansas City Power & Light Company
1200 Main
Kansas City, MO 64105
Roger.steiner@kcpl.com

Dean L. Cooper
312 East Capitol
P. O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Diana M. Vuylsteke
Edward Downey
211 N. Broadway, Suite 3600
St. Louis, MO 63102
dmvuylsteke@bryancave.com
efdowney@bryancave.com

David Woodsmall
807 Winston Court
Jefferson City, MO 65101
david.woodsmall@woodsmalllaw.com

/s/ James B. Lowery
James B. Lowery