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March 13, 1997

**VIA FEDERAL EXPRESS**

Mr. Cecil I. Wright  
Executive Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: Case No. EM-96-149

Dear Mr. Wright:

Enclosed for filing on behalf of Union Electric Company in the above matter are an original and fourteen copies of Motion for Extension of Time in which to File Experimental Retail Wheeling Pilot Program.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Sincerely,

A handwritten signature in black ink, appearing to read "WJN".

William J. Niehoff  
Attorney

WJN/meh  
Enclosure(s)  
cc: Office of Public Counsel  
Counsel of Record

FILED  
MAR 14 1997  
MISSOURI  
PUBLIC SERVICE COMMISSION

FILED

MAR 14 1997

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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 EXTENSION OF TIME IN WHICH  
TO FILE EXPERIMENTAL RETAIL WHEELING PILOT PROGRAM

COMES NOW Applicant, Union Electric Company ("UE"), by counsel, and moves the Missouri Public Service Commission ("Commission") to make and enter its order extending the time within which UE has to file the Experimental Retail Wheeling Pilot Program ("Experimental Pilot Program"), for the following reasons:

1. Parties to the merger proceeding entered into a Stipulation and Agreement ("Stipulation") on July 12, 1996 which included the commitment by UE that it would propose and file with the Commission an experimental retail wheeling pilot program for 100 MW of power to be available to all major classes of Missouri retail electric customers, "as soon as practical, but no later than March 1, 1997."

2. The Stipulation provided that prior to filing its proposal with the Commission, UE would seek "substantive input" from Missouri retail electric customers, Missouri Public Service Commission Staff, Office of Public Counsel, and others, including Trigen-St. Louis Energy Corporation and Missouri Retailers Association.

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3. On February 21, 1997, the Missouri Commission issued its Report and Order approving the Application in this matter, subject to certain conditions which UE accepted. The Report and Order became final on March 4, 1997.

4. In the Report and Order, the Commission stated that it would entertain a motion to modify the original due date to permit UE the opportunity to obtain "substantive input" on the Experimental Pilot Program. (Report and Order, p. 6).

5. The Stipulation originally permitted over seven months from the date signed within which UE might seek substantive input, organize, draft and file the Experimental Pilot Program.

6. To prepare the Experimental Pilot Program, UE plans to meet with and seek substantive input from each of the parties to the Stipulation, as well as several other commercial, residential and public interest groups.

7. UE believes that solicitation of input from interested parties, research for and drafting of the Experimental Pilot Program will require the same amount of time as originally contemplated in the Stipulation. Accordingly, UE requests that the deadline for filing the Experimental Pilot Program be extended until no later than September 1, 1997.


8. UE does not believe that permitting this extension of time will prejudice any party, since the delay is necessary to seek and receive substantive input from a large number of diverse customer groups and to develop a fair, reliable and complete Pilot; furthermore, the Stipulation expressly provides that the

Experimental Pilot Program need not be made effective until after the merger closes, which, at the present time, is not expected to have occurred before September 1, 1997.

WHEREFORE, UE respectfully requests that the Commission enter its order extending the time within which it has to file the Experimental Pilot Program until no later than September 1, 1997.


Respectfully submitted,

UNION ELECTRIC COMPANY

By   
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William J. Niehoff, MBE 36448  
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CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of March, 1997, a copy of the foregoing was served upon All Parties of Record.

  
William J. Niehoff

**MISSOURI PUBLIC SERVICE COMMISSION**  
**Case No. EM-96-149**  
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