

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

In the Matter of the Application of Ameren Transmission)
Company of Illinois for Other Relief or, in the Alternative,)
a Certificate of Public Convenience and Necessity)
Authorizing it to Construct, Install, Own, Operate,) **File No. EA-2015-0146**
Maintain and Otherwise Control and Manage a)
345,000-volt Electric Transmission Line from Palmyra,)
Missouri, to the Iowa Border and Associated Substation)
near Kirksville, Missouri.)

**NEIGHBORS UNITED’S MOTION FOR LEAVE TO LATE FILE RESPONSE TO
ATXI’S MOTION TO COMPEL**

COMES NOW Neighbors United Against Ameren’s Power Line (Neighbors United), by and through the undersigned counsel, and hereby respectfully moves the Commission to accept its Response filed on October 15, 2015. In support of the Motion, the undersigned states as follows:

1. On October 20, 2015, ATXI filed a reply to Neighbors United’s October 15, 2015, Response to ATXI’s Motion to Compel. Neighbors United’s filing requested that the Commission deny ATXI’s Motion to compel approximately 407 individuals to respond to ATXI’s data requests in this case.

2. Paragraph twelve of ATXI’s Reply alerted the undersigned counsel that Neighbors United’s Response was filed three days later than the time stated in the Commission’s Rule 4 CSR 240-2.080(13).

3. The undersigned inadvertently calendared a due date for the response 10 “business” days after ATXI’s October 2, 2015 Motion to Compel Discovery, instead of calendaring the response for ten “calendar” days. It was inadvertent and not intended as a blatant showing of disregard for the Commission or the Commission’s rules as ATXI suggests.

4. Good cause exists for the Commission to consider Neighbors United's filing as it was an inadvertent filing error and was not intended to harass or cause a delay for any party. Accepting Neighbors United's Response will allow the Commission to consider all issues surrounding ATXI's Motion to Compel Discovery.

5. The undersigned is available for an oral argument on ATXI's Motion to Compel Discovery should the Commission decide it would be beneficial and aid it in deciding the current discovery issues.

WHEREFORE, Neighbors United moves for the Commission to accept its inadvertently late filed Response to ATXI's Motion to Compel and for any other relief the Commission deems just and reasonable in the circumstances.

Respectfully submitted,

HERNANDEZ LAW FIRM, LLC

By: **/s/ Jennifer Hernandez**

Jennifer Hernandez, MO Bar No. 59814

1802 Sun Valley Drive

Jefferson City, Missouri 65109

Phone: 573-616-1486

Fax: 573-342-4962

E-Mail: jennifer@hernandezlegal.com

ATTORNEY FOR NEIGHBORS
UNITED AGAINST AMEREN'S POWER
LINE

Certificate of Service

I certify that a true copy of the above and foregoing was served to all counsel of record by electronic mail this 21st day of October 2015.

/s/ Jennifer Hernandez

Jennifer Hernandez