

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Purchased Gas Adjustment) Case No. GR-2010-0180
(PGA) Factors.)

MOTION FOR CONTINUANCE

COMES NOW Union Electric Company, d/b/a Ameren Missouri and asks the Commission to continue the date for Staff to file its Recommendation in the above-captioned ACA proceeding, and to direct Ameren Missouri to file a Status Report on the pending litigation by Ameren Missouri to obtain refunds of allegedly unlawful pipeline charges from MoGas Pipeline, LLC (MoGas). In support of its Motion, Ameren Missouri states:

1. Ameren Missouri expects that the Staff Recommendation in this case will address the gas transportation costs incurred by Ameren Missouri in prior ACA periods which remain open at least in part pending resolution of Ameren Missouri litigation against MoGas to recover allegedly unlawful transportation costs.
2. Ameren Missouri expects that it will be able to give the Commission and the Staff a clearer understanding of the status of that litigation by the end of April, 2012.
3. Ameren Missouri expects that knowledge of the status of that litigation will assist the Staff in formulating its recommendation, and the Commission in considering that recommendation.
4. Ameren Missouri has discussed this proposal with the Staff, and represents that the Staff supports the proposal.

WHEREFORE, Ameren Missouri respectfully asks the Commission to generally continue the time for the Staff to file its Recommendation in this case until further order of the

Commission, and to direct Ameren Missouri to file a Status Report on pending litigation for recovery of gas transportation costs from MoGas not later than April 30, 2012.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 11th day of January, 2012.

**Missouri Public Service
Commission**

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/s/ Wendy K. Tatro

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