

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

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(16) Integrated )  
Resource Planning Standard as Required by ) **File No. EW-2009-0290**  
Section 532 of the Energy Independence and )  
Security Act of 2007. )  
)

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(17) Rate Design )  
Modifications to Promote Energy Efficiency ) **File No. EW-2009-0291**  
Investments Standard as Required by Section )  
532 of the Energy Independence and Security )  
Act of 2007. )  
)

In the Matter of the Consideration of Adoption )  
of the PURPA Section 111(d)(18), Smart Grid )  
Investments Standard, and PURPA Section ) **File No. EW-2009-0292**  
111(d)(19), Smart Grid Information Standard )  
as Required by Section 1307 of the Energy )  
Independence and Security Act of 2007. )  
)

**UNION ELECTRIC COMPANY d/b/a AMERENUE'S  
MOTION FOR EXTENSION OF TIME TO REPLY TO THE  
STAFF'S SEPTEMBER 22, 2009 RESPONSE**

COMES NOW Union Electric Company d/b/a AmerenUE (Company or AmerenUE), by  
and through counsel and for its *Motion for Extension of Time* states as follows:

1. On May 6, 2009, the Commission issued its *Order Consolidating Workshops, Consolidating Case and Correcting File Captioning*. That Order also ordered the Commission's Staff to file, no later than July 31, 2009, a report describing the progress of the workshops and a recommendation as to whether any of the PURPA files should be addressed in workshop settings

separate from the Integrated Resource Planning Rules (IRP) Workshops which at that time had been scheduled to conclude in late July or early August.

2. On July 30, 2009, the Staff requested an extension of time to September 17, 2009, because the IRP workshops had, at that time, been extended through September 14-15, 2009. No participant, including the Company, opposed the Staff's request. By Order dated August 3, 2009, the Commission granted the Staff's Request. The Staff thereafter filed its report on September 22, 2009.<sup>1</sup>

3. On September 24, 2009, the Commission granted the Staff's request to late-file its report, and ordered that any responses to the Staff's report be filed by October 5, 2009.

4. While it continues to be the Company's position (for the reasons already provided in prior Company filings in this docket) that none of the subject PURPA standards qualify for the prior state action exemption, and that two of the standards (dealing with smart grid investments and information) should properly be considered apart from efforts to rewrite the IRP rules, given the Staff's position on those issues and the fact that the Company agrees that two of the standards can be considered in the IRP rule workshops, a response to the Staff's latest report would be more useful to the Commission and the other participants in these dockets, and more meaningful, if it followed conclusion of the upcoming IRP workshop session that is scheduled to occur on October 19-20, 2009.

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<sup>1</sup> The Staff report was filed five days late, and it was accompanied by a request for leave to late-file the same.

WHEREFORE, the Company requests an extension of time to respond to the Staff's latest report to October 26, 2009, one week after the scheduled conclusion of the upcoming IRP workshop.

Dated: October 2, 2009

Respectfully submitted:  
SMITH LEWIS, LLP

UNION ELECTRIC COMPANY,  
d/b/a AmerenUE

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion was served via e-mail on the following persons on the 2<sup>nd</sup> day of October, 2009.

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**/s/James B. Lowery**