

Missouri Public Utility Alliance

Missouri Association of Municipal Utilities
Municipal Gas Commission of Missouri
Missouri Joint Municipal Electric Utility Commission

2407 W. Ash
Columbia, MO 65203-0045

October 1, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102


RE: Case No. EO-2001-~~84684~~
Missouri Public Service, Division of UtiliCorp United

Dear Mr. Roberts:

Enclosed for filing in the above referenced matter are the original and eight (8) copies of the Missouri Joint Municipal Electric Utility Commission's Motion For Leave To File Out Of Time and Statement Of Positions. Copies of the foregoing documents have been mailed or hand delivered today to all parties of record.

Thank you for your attention to this matter.

Sincerely,



Duncan E. Kincheloe

Enclosures

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

FILED³

OCT - 1 2001

Missouri Public
Service Commission

In the Matter of the Application of Union)
Electric Company d/b/a AmerenUE for an)
Order Authorizing It to Withdraw from)
the Midwest ISO to Participate in the)
Alliance RTO)
)

Case No. EO-2001-684

MOTION FOR LEAVE TO FILE OUT OF TIME

COMES NOW the Missouri Joint Municipal Electric Utility Commission ("MJMEUC") and respectfully states as follows:

1. On June 11, 2001, Union Electric Company d/b/a AmerenUE ("UE" or "Company") filed an application with the Missouri Public Service Commission ("Commission") for an order authorizing the Company to withdraw from the Midwest Independent System Operator ("MISO") in order to participate in the Alliance Regional Transmission Organization ("ARTO").

2. MJMEUC filed timely intervention and was granted intervention by the Commission in an order dated July 26, 2001.

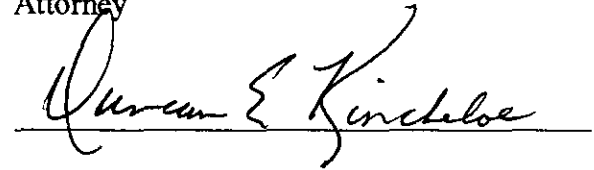
3. Pursuant to the Commission's Order Adopting Procedural Schedule, issued August 15, 2001, MJMEUC participated with the parties in assembling the List Of Issues, Order Of Witnesses And Order Of Cross-Examination ("List of Issues"). Although the Staff of the Missouri Public Service Commission ("Staff") was diligent in working with all parties to develop the List of Issues, the process was very difficult and as a result the List of Issues was late filed by the Staff on September 28, 2001.

4. MJMEUC is aware of the importance of meeting the Commission's deadlines, but was unable to complete its Statement of Positions on September 28, 2001 without reviewing all changes made by the various parties in the final List of Issues and responding as completely as possible to that list.

WHEREFORE, MJMEUC respectfully requests that the Commission grant leave to file the accompanying Statement of Positions out of time.

Respectfully submitted,

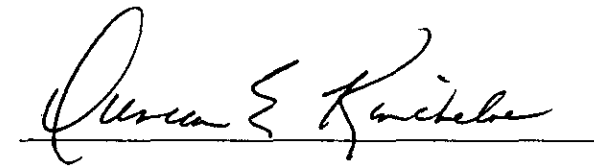
Duncan E. Kincheloe
Attorney

A handwritten signature of Duncan E. Kincheloe in cursive script, written over a horizontal line.

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Attorney for the Missouri Joint Municipal
Electric Utility Commission

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of October 2001.

A handwritten signature of Duncan E. Kincheloe in cursive script, written over a horizontal line.