

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

In the Matter of the Application of)	
Union Electric Company for Authority)	
To Continue the Transfer of)	File No. EO-2011-0128
Functional Control of Its Transmission)	
System to the Midwest Independent)	
Transmission System Operator, Inc.)	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or the “Company”), and for good cause shown hereby requests the Commission provide it a one-week extension of time beyond the default response time provided for by 4 CSR 240-2.080(13) with respect to the Missouri Joint Municipal Electric Utility Commission’s (“MJMEUC”) February 1, 2017 Response to the Joint Motion filed by the Company, the Staff, the Office of the Public Counsel and the Missouri Industrial Energy Consumers (collectively, the “Joint Movants”) on January 23, 2017. In support of its request, the Company states as follows:

1. MJMEUC has filed several pages of responses and arguments respecting bases contained in the Joint Movant’s January 23 Motion, in which the Joint Movants requested that the Commission modify its April 19, 2012 Order in this docket. MJMEUC’s responses and arguments raise technical and policy issues to which the Company wishes to respond. For the reasons given below, the Company cannot effectively do so within the default response time provided for in 4 CSR 240-2.080(13).¹

2. The undersigned counsel for the Company, who has been the Company’s primary attorney with respect to all its Regional Transmission Organization (“RTO”) matters before the

¹ Because February 11 falls on a Saturday and Monday February 13 is a State holiday, the deadline under the rule would be February 14.

Commission over the prior approximately 15-year period, also has primary responsibility for the Company's participation in Kansas City Power & Light Company's general rate case evidentiary hearings² which commence February 6, 2017. The undersigned counsel will be engaged in those hearings through February 9, 2017.

3. Moreover, the undersigned counsel for the Company has substantial responsibilities for the Company's surrebuttal testimony that must be filed by February 10, 2017, in the Company's pending general rate proceeding.³

4. Finally, one of the Company's key personnel who has significant responsibility for its RTO participation and, more specifically this docket, will be out of the office for his daughter's wedding from February 7 through February 16, 2017.

5. For the foregoing reasons, which constitute good cause for an extension of time, the Company requests a one-week extension beyond the default due date to February 21, 2017. The Company also requests expedited treatment of this Motion. Granting expedited treatment will result in no harm or prejudice to any party, and will benefit the Company so that it can plan its work in addressing both its other pending matters and this docket. Granting this request will also not prejudice any party because a short, 7-day extension of time will not impair the Company's ability to comply with the Commission's April 12, 2012 order, as it stands now, or such order, as the Joint Movants have requested that it be modified.

6. The undersigned has confirmed with Staff Counsel that the Staff of the Commission does not object to this request. The undersigned counsel has not been able to contact counsel for the other Joint Movants or for MJMEUC, and therefore cannot represent their

² File No. ER-2016-0285.

³ File No. ER-2016-0179.

position on this Motion, but has filed it now to place the issue of the requested extension before the Commission as soon as possible.

WHEREFORE, the Company requests an extension of time to February 21, 2017 to respond to MJMEUC's Response.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case, on this 5th day of February, 2017.

/s/James B. Lowery
James B. Lowery