



Commissioners  
KELVIN L. SIMMONS  
Chair  
CONNIE MURRAY  
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## Missouri Public Service Commission

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September 28, 2001

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Director, Utility Operations  
ROBERT SCHALLENBERG  
Director, Utility Services  
DONNA M. KOLILIS  
Director, Administration  
DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge  
DANA K. JOYCE  
General Counsel

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

**FILED<sup>3</sup>**

**SEP 28 2001**

Missouri Public  
Service Commission

**RE: Case No. EO-2001-684**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR LEAVE TO FILE OUT OF TIME**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Steven Dottheim  
Chief Deputy General Counsel  
(573) 751-7489  
(573) 751-9285 (Fax)

SD:ccl  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
SEP 28 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 Staff ("Staff") of the Missouri Public Service Commission ("Commission"), on its own behalf and on behalf of the other parties to this case, and respectfully states as follows:

1. Pursuant to the Commission's Order Adopting Procedural Schedule, issued August 15, 2001, the Staff was to file, on behalf of the parties to this case, a List Of Issues, Order Of Witnesses And Order Of Cross-Examination ("List Of Issues") by September 26, 2001.

2. Unfortunately, the process of compiling the issues list proved more complicated than anticipated, and as a result, the task was not completed in time to meet the scheduled filing deadline. The parties realize the necessity for meeting Commission deadlines, but have endeavored to provide the Commission with a List Of Issues which should prove helpful in organizing and setting out the matters being contested in this proceeding.

3. On behalf of the parties, the Staff apologizes for the delay in making this filing.

4. As a consequence of the time that it has taken the parties to file this List Of Issues, some parties may not be able to file their Statement Of Position this date as directed by the Commission. Those parties that are not able to file their Statement Of Positions this date will do so on Monday October 1, 2001. The Staff does not presume to speak on behalf of any entity


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other than the Staff when it states that it has no objection to any party filing its Statement Of Positions on Monday, October 1, 2001. Again, the parties are cognizant of the need to meet deadlines, and at the same time are endeavoring to provide the Commission with Statements Of Positions which hopefully will prove helpful in organizing and setting out the positions of the various parties to this case.

WHEREFORE, the Staff respectfully requests that the Commission grant leave to file the accompanying List Of Issues, Order Of Witnesses, And Order Of Cross-Examination out of time.

Respectfully submitted,

DANA K. JOYCE  
General Counsel


  
Dennis L. Frey  
Associate General Counsel  
Missouri Bar No. 44697

Steven Dottheim  
Chief Deputy General Counsel  
Missouri Bar No. 29149

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#### **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 28th day of September 2001.

  
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**Service List for**  
**Case No. EO-2001-684**  
**Verified: September 26, 2001 (ccl)**

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