

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to)
Increase Its Revenues for Electric)
Service.)

File No. ER-2014-0258

MOTION TO EXTEND DATE FOR FILING POSITION STATEMENTS

Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) moves the Commission for an order extending by one day, to Friday, February 20, 2015, the date for parties to file their respective statements of position. In support of its motion, Ameren Missouri states:

1. The procedural order in this case specifies that an issues list and order of witnesses was to be filed on Wednesday, February 18, 2015, followed by each party filing its respective position statement on Thursday, February 19, 2015. In accordance with that requirement, late yesterday Staff filed the *Joint List of Issues, List and Order of Witnesses, Order of Cross Examination, and Order of Opening Statements* (“Joint List”) on behalf of all parties.

2. While the Joint List was being drafted and revised, all but one of Ameren Missouri’s attorneys was engaged in taking depositions, which made it impossible for the Company to provide input or comments to those drafts as they were circulated among the parties. In addition, Ameren Missouri also was unable to address requests by one or more parties for possible changes in the order of witnesses and the dates certain issues would be set for hearing. As a result, it is likely the Joint List will be amended to reflect Ameren Missouri’s input regarding issues to be considered in this case and the order of witnesses.

3. Because the statement of issues reflected in the Joint List will likely be subject to one or more changes, and also because the schedule of depositions, which continues today and tomorrow, has made, and will continue to make, it impossible for Ameren Missouri’s counsel to devote sufficient time to complete its statement of issues by the deadline currently specified in the procedural order, the Company seeks to extend the deadline for filing its position statement, as well as the position statements of all other parties, by one day.

4. The one day extension requested in this motion will not prejudice any party to this case, and will not unduly inconvenience or burden the Commission. As evidence of this fact, Ameren Missouri has contacted counsel for all parties and each has responded that his or her client does not object to the relief the Company seeks by its motion.

WHEREFORE, for the reasons previously stated, Ameren Missouri moves the Commission for an order extending the deadline for filing positions statements in this case by one day, to February 20, 2015.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

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**ATTORNEYS FOR UNION ELECTRIC COMPANY
d/b/a/ AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 19th day of February, 2015, to all parties of record in File No. ER-2014-0258.

/s/ L. Russell Mitten