

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

In the Matter of the First True-Up)	
Filing Under the Commission-)	
Approved Fuel Adjustment Clause of)	File No. ER-2010-0274
Union Electric Company d/b/a Ameren Missouri.)	

MOTION TO MODIFY BRIEFING SCHEDULE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), and hereby respectfully requests that the current briefing schedule be modified. In this regard, the Company states as follows:

1. The Company’s Reply Brief in response to the Staff’s Brief is currently due to be filed on May 21, 2011. Since the Staff filed its brief the undersigned counsel for the Company, who is principally responsible for this docket, has been substantially and continuously engaged in preparation for and litigation of the Company’s currently pending electric rate case, Case No. ER-2011-0028. In addition, the undersigned counsel has had other responsibilities relating to, among other matters, the Commission’s April 27, 2011 Report and Order in Case No. EO-2010-0255, as well as responsibilities relating to legislative issues, both of which carried with them deadlines established by law that necessitated that those matters be addressed prior to preparing the Company’s Reply Brief in this docket. Those responsibilities have prevented the undersigned counsel from having sufficient time to properly review the Staff’s Brief, to conduct research as needed, and to properly prepare the Company’s Reply Brief.

2. Consequently, the Company hereby requests a two-week extension of time, to June 3, 2011, of the deadline by which the Company must file its Reply Brief.

3. Because the timeline for processing this case has currently been extended only to June 30, 2011, the Company also suggests that the requested extension of the deadline for filing its Reply

Brief be accompanied by a further extension of the timeline (to July 15 or perhaps July 31) in order to provide the Commission sufficient time to consider the briefs, deliberate, and issue a decision.

4. The undersigned counsel for the Company has communicated with counsel for the Staff and the Office of the Public Counsel, both of whom have indicated that they have no objection to the above-requested extension of time to file the Company's Reply Brief or the above-suggested extension of the timeline for processing this case.

5. This request is not made for the purpose of prejudicing any party.

WHEREFORE, the Company hereby requests that the briefing schedule be modified so that the Company's Reply Brief shall be due on June 3, 2011.

SMITH LEWIS, LLP

/s/James B. Lowery

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via e-mail on Staff Counsel Nathan Williams and Public Counsel Lewis Mills, on this 18th day of May, 2011.

/s/James B. Lowery