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October 19, 2001

FILED

OCT 24 2001

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Missouri Public
Service Commission

Re: Staff Complaint of Union Electric Rates, Case No. EC-2002-1

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Motion for extension of time to file a responsive pleading. An additional copy of this document is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (11)
cc/enc: All parties of record

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

FILED

OCT 24 2001

Staff of the Missouri Public Service
Commission)

Complainant,)

v.)

Union Electric Company, d/b/a
AmerenUE,)

Respondent.)

Missouri Public
Service Commission

Case No. EC-2002-1

**MOTION OF THE MISSOURI ENERGY GROUP
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

COMES NOW Missouri Energy Group ("MEG") by and through its attorneys of record and files this Motion for an extension of time to file a responsive pleading to the Commission's order requiring MEG to admit or deny each allegation in Staff's Complaint and Union Electric Company's Answer thereto. In support of its motion the MEG states as follows:

1. The MEG filed its application to intervene on July 12, 2001. An Order granting this intervention was issued on October 1, 2001. From July 12 until October 1, the MEG was not on the Commission's service list and received no orders and limited pleadings from other parties.

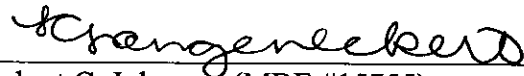
2. After receiving the Order granting its intervention, MEG submitted data requests to all parties to this case on October 10, 2001. No responses to any of those data requests have been received to date.

3. Because MEG has obtained no data through discovery either supporting or opposing the Complaint, the MEG is not in a position to admit or deny each factual assertion or legal conclusion in the Complaint.

4. In order to prepare a proper response and comply with the Commission's Order granting MEG's intervention in this proceeding, the MEG requests that the Commission grant an extension of time of ninety (90) days to respond to the Staff's Complaint and Union Electric's response thereto which was filed on August 10, 2001.

WHEREFORE, the MEG respectfully requests that the Commission grant it an additional ninety (90) days to file its responsive pleadings in this case.

Respectfully Submitted,



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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EC-2002-1

Dated at St. Louis, Missouri this 19th day of October, 2001:

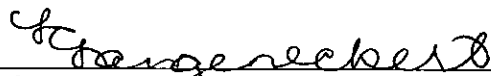
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