

**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)	Case No. EO-2011-0128
Functional Control of Its Transmission)	
System to the Midwest Independent)	
Transmission System Operator, Inc.)	

**AMEREN MISSOURI'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO COMPEL**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), by and through counsel, and hereby requests that the deadline for response to Public Counsel's November 4, 2011 Motion to Compel be extended to Monday, November 14, 2011. In support of this Motion, Ameren Missouri states as follows:

1. On November 4, 2011 Public Counsel filed a Motion to Compel responses to ten data requests that had been objected to by Ameren Missouri.

2. On November 7, 2011 an Order was issued by delegation shortening the 10-day response time allowed by 4 CSR 240-2.080(15) to six days, thereby setting the deadline for response to today, November 10, 2011.

3. The Company and Public Counsel have resolved the Company's objections to nine of the ten data requests that are the subject of Public Counsel's Motion to Compel, and are continuing to work to resolve the Company's objection to the tenth data request. Therefore, Public Counsel has indicated that Public Counsel has no objection to an extension of the deadline to respond to Public Counsel's Motion to Compel to Monday, November 14, 2011.

WHEREFORE, Ameren Missouri prays for an order extending the deadline to respond to Public Counsel's November 4, 2011 Motion to Compel to Monday, November 14, 2011.

Dated: November 7, 2011.

Respectfully submitted,

SMITH LEWIS, LLP

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel of record for all parties in this case, on this 7th day of November, 2011.

/s/James B. Lowery
James B. Lowery