

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Permission and)	
Approval and a Certificate of Public Convenience and)	
Necessity Authorizing it to Construct, Install, Own,)	File No. EA-2012-0281
Operate, Maintain and Otherwise Control and Manage)	
A Utility Waste Landfill and Related Facilities at its)	
Labadie Energy Center)	

**MOTION OF LABADIE ENVIRONMENTAL ORGANIZATION AND SIERRA CLUB
FOR ADDITIONAL TIME WITHIN WHICH TO RESPOND TO UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI'S SUGGESTIONS
OPPOSING APPLICATION TO INTERVENE.**

COMES NOW Labadie Environmental Organization ("LEO") and Sierra Club and states in support of its request for additional time within which to respond:

1. Late yesterday afternoon, March 4, 2013, Union Electric Company d/b/a Ameren Missouri filed its Suggestions Opposing Labadie Environmental Organization and Sierra Club's Application to Intervene. The Suggestions contain a lengthy attack on LEO's and Sierra Club's application.

2. LEO and the Sierra Club are working to respond to the Suggestions and to offer support for their application, including a defense of their standing to pursue intervention. However, the Application is scheduled to be heard by the Commission and an order issued tomorrow, March 6, 2013, at 9:30 a.m., approximately 40 hours after the Suggestions were filed.

3. If the Commission is inclined to grant the Application to Intervene on March 6, then there is no need for additional filings on this issue. However, if that is not the case, then LEO and the Sierra Club respectfully request additional time within which to respond to the matters raised in Ameren's Suggestions, up to and including Thursday, March 14, 2013.

Respectfully submitted,

LABADIE ENVIRONMENTAL ORGANIZATION
SIERRA CLUB

By: /s/ Elizabeth J. Hubertz

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March 5, 2013

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was sent via email on March 5, 2013, to all parties of record.

/s/ Elizabeth J. Hubertz