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
Functional Control of Its Transmission
System to the Midwest Independent
Transmission System Operator, Inc.

Case No. EO-2011-0128

RESPONSE TO PUBLIC COUNSEL'S MOTION TO CONTINUE HEARING

COME NOW the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"),

by and through their attorney Douglas L. Healy, and hereby states that MJMEUC does not

oppose OPC's request for a continuance in this matter.

Respectfully Submitted,

By: <u>/s/ Douglas L. Healy</u> Douglas L. Healy Missouri Bar No. 51630 Healy & Healy, LLC 939 Boonville, Suite A Springfield, Missouri 65802 Telephone: (417) 864-8800 Facsimile: (417) 869-6811 Email: dhealy@mpua.org

ATTORNEY FOR MJMEUC

<u>CERTIFICATE OF SERVICE</u> I hereby certify that the foregoing application to intervene out of time was served by e-mailing a copy to all parties on the Commission's Service List this 18th day of November, 2011.

/s/ Douglas L. Healy_____ DOUGLAS L. HEALY