

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

In the Matter of Union Electric)
Company, d/b/a Ameren Missouri's)
Tariff to Increase Its Revenues) Case No. ER-2014-0258
For Electric Service)

**MOTION FOR LEAVE TO FILE OBJECTION TO
APPLICATION TO INTERVENE OUT OF TIME**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and for its *Motion for Leave to File Objection to the Application to Intervene After Intervention Date of United for Missouri, Inc.* (“UFM”) states as follows:

1. On October 24, 2014, UFM filed its *Application for Leave to Intervene After Intervention Date* (“Application”).
2. On November 4, 2014, the MIEC filed its *Objection to the Application to Intervene After Intervention Date of United for Missouri, Inc.* (“Objection”).
3. Commission Rule 4 CSR 240-2.080 (13) provides that parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the Commission.
4. The MIEC’s Objection was filed at 12:48 a.m. on November 4, 2014 and was therefore filed after expiration of the time period specified by 4 CSR 240-2.080 (13).
5. Commission Rule 4 CSR 240-2.050(3) provides that when an act is required by rule of the Commission within a specified period of time, the Commission may after the expiration of the specified period permit the act to be done for good cause shown.

6. Good cause exists to grant the MIEC's motion and to permit the filing of its Objection. As shown by the attached Affidavit of Connie Hoffman, Director of Information Technology for Bryan Cave LLP, the late filing of the MIEC's Objection was caused by a temporary system-wide inability of Bryan Cave's computer server to connect with outside computer servers, including the Commission's Electronic Filing Information System (EFIS).

7. No party will be prejudiced by the delay in the filing of the MIEC's Objection.

WHEREFORE, based on the foregoing, the MIEC respectfully requests that the Commission issue an order granting its motion for leave to file its Objection.

Dated: November 4, 2014

Respectfully submitted,

BRYAN CAVE LLP

/s/ Diana Vuylsteke

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Attorneys for the
Missouri Industrial Energy Consumers

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic mail this 4th day of November, 2014, to all counsel of record.

/s/ Diana Vuylsteke

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AFFIDAVIT OF CONSTANCE O. HOFFMAN

I, Constance O. Hoffman, being duly sworn upon oath, state:

1. I am Constance O. Hoffman and I have personal knowledge of the facts stated in this affidavit. The statements that follow in this affidavit are made to the best of my knowledge and belief.

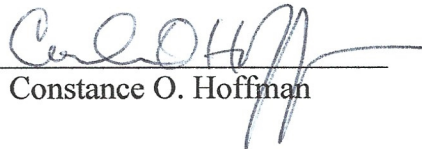
2. I am the Chief Information Officer of Bryan Cave, LLP and my business address is 211 N. Broadway, Suite 3600, St. Louis, Missouri 63102.

3. During the evening of November 3, 2014 and early morning of November 4, 2014, Bryan Cave LLP experienced computer problems as a result of a system-wide change Bryan Cave LLP made the previous weekend. The computer problem prevented access to remote computer servers which prevented connection to the Commission's Electronic Filing Information System (EFIS).

VERIFICATION

STATE OF MISSOURI)
)
CITY OF ST. LOUIS) **ss**

The undersigned, being first duly sworn upon her oath, states that she is the person making the foregoing Affidavit, and that it is true and correct to the best of her knowledge and belief.

Signature: 
Constance O. Hoffman

Subscribed and sworn to before me, this 4th day of November, 2014.

Notary Public