

October 4, 1999

**VIA Hand Delivery**

Mr. Dale Hardy Roberts  
Executive Secretary  
Missouri Public Service Commission  
301 West High Street, 7-N  
Jefferson City, MO 65101

**FILED**

**OCT 4 1999**

**Missouri Public  
Service Commission**



Re: Case No. EA-2000-37 - Application of Union Electric Company,  
d/b/a Ameren UE, for Approval of the Transfer of Generating  
Assets by an Affiliate to Another Affiliate

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company d/b/a AmerenUE are an original and fourteen (14) copies of Motion For Extension Of Time.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Your prompt attention to this matter is appreciated.

Sincerely,

*William J. Niehoff /sh*

William J. Niehoff  
Attorney-At-Law

WJN:rd  
enclosures

cc: John B. Coffman, Office of Public Counsel  
Dennis L. Frey, Missouri Public Service Commission

STATE OF MISSOURI  
MISSOURI PUBLIC SERVICE COMMISSION

FILED<sup>2</sup>

OCT 4 1999

Missouri Public  
Service Commission

In the matter of the Application of )  
Union Electric Company, d/b/a AmerenUE, )  
For approval of the transfer of generating ) Case No. EA-2000-37  
Assets by an affiliate to another )  
Affiliate. )

**MOTION FOR EXTENSION OF TIME**

COMES NOW Union Electric Company (d/b/a AmerenUE), by counsel, and moves the Missouri Public Service Commission ("Commission") to make and enter its Order extending the time in which AmerenUE has in which to file its Direct Testimony, and in support thereof, states:

1. AmerenUE filed this Application, pursuant to 15 U.S.C. §79z-5a (c) of the Public Utility Holding Company Act of 1935 (hereinafter "Section 32(c)") seeking to have the Commission make three findings in connection with a proposed transfer of Central Illinois Public Service Company (d/b/a AmerenCIPS) to a new affiliate, Genco. Specifically, AmerenUE requested the Commission to find that the proposed transfer will benefit consumers, is in the public interest, and does not violate Missouri law.

2. By Order effective September 27, 1999, the Commission set the schedule for submission of testimony and other deadlines, including the hearing date. The Scheduling Order established October 4, 1999 as the date by which AmerenUE would file its Direct Testimony.

3. Both before and since the Order Adopting Procedural Schedule became effective, the Missouri Public Service Commission Staff ("Staff"), the Office of Public Counsel ("OPC") and AmerenUE have engaged in productive settlement negotiations.

These negotiations continue and AmerenUE believes that a significant likelihood exists that all outstanding issues can be agreed to and a settlement reached.

4. Accordingly, AmerenUE respectfully requests the Commission to extend the time in which it has to file its Direct Testimony in this matter from October 4, 1999 to October 11, 1999 so that settlement negotiations can continue. AmerenUE has consulted with counsel for Staff and OPC and these parties do not object to this extension. In the event that further discussions do not result in a settlement of all issues, AmerenUE recognizes that the Staff and OPC may require a similar extension of time in which to respond to testimony. In that event, other dates in the Scheduling Order, though not necessarily the Hearing date, may need to be rearranged.

WHEREFORE, considering the above, AmerenUE respectfully requests that the Commission enter its Order as described above extending the time with in which AmerenUE shall have to file Direct Testimony in this matter until October 11, 1999.

Respectfully submitted,

UNION ELECTRIC COMPANY

William J. Niehoff / sh  
William J. Niehoff, MBE#36448  
Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149  
St. Louis, Missouri 63166-6149  
(314) 554-2514 (voice)  
(314) 554-4014 (fax)  
[william\\_j\\_niehoff@ameren.com](mailto:william_j_niehoff@ameren.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the above pleading has been served on the Office of Public Counsel and the Staff of the Missouri Public Service Commission by facsimile, hand-delivery, or first-class mail this 4<sup>th</sup> day of October, 1999.

William J. Niehoff / sh