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

Union Electric Company

) Docket No. EM-96-149

## Request for Leave to Submit Late Filing

COMES NOW Union Electric Company and requests leave of this Commission to submit its Response to Application to Intervene Filed by Trigen-St. Louis Energy Corporation. In support of its request, the Company states as follows:

- 1. On November 20, 1995, Trigen-St. Louis Energy Corporation filed it Application to Intervene in the instant docket.
- 2. According to 4 CSR 240-2.080 (12) parties "shall be allowed ten (10) days from the date of filing in which to respond to any motion or other pleading unless otherwise ordered by the commission."
- 3. Union Electric hereby requests an order of the Commission allowing the submission of the Company's Response to TrigenSt. Louis' Application. The Company has filed pleadings associated with its merger in the Illinois Commerce Commission and is preparing a similar filing with the Federal Energy Regulatory Commission. In addition, it is preparing associated filings for the Securities and Exchange Commission and the Nuclear Regulatory Commission. The press of these cases being pursued simultaneously has not allowed for the preparation of the response to this application within the ten days set out in the regulations.

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4. Since the period for intervention has not concluded, the Company submits that no delay will be caused in this matter, if the Company' Response is filed and considered by the Commission.

WHEREFORE, for the reasons set forth above, Union Electric Company respectfully requests that its Response be accepted for filing.

Respectfully submitted,
UNION ELECTRIC COMPANY

Ву

James/J. Cook

Associate General Counsel Union Electric Company 1901 Chouteau Avenue P.O. Box 149 (M/C 1310) St. Louis, Missouri 63166 (314) 554-2237

## **VERIFICATION**

I, James J. Cook, being first duly sworn on oath, state that I am an attorney for Union Electric Company, that I have read the foregoing instrument, and that the matters stated therein are true to the best of my knowledge and belief.

	James J. Cook
Subscribed to and sworn to the state of the sworn to the	to before me this / day of
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	James J. Cook