

(314) 934-2332



February 4, 1991

Mr. Brent Stewart
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo. 65102

Re: Case No. EO-91-251

Dear Mr. Stewart:

Enclosed, for filing with the Commission, are the original and fourteen (14) copies of "Request of Union Electric Company for Additional Time to Respond to Filing of Laclede Gas Company."

Please date-stamp the additional copy of this letter provided herein and return the same in the pre-addressed stamped envelope provided.

Very truly yours,

Michael F. Barnes

Michael F. Barnes
Attorney

cc: See attached Certificate of Service

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PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Application of Union Electric)
Company for Variance from)
Promotional Practices Rule for) Case No. EO-91-251
Good Cause Shown and for Approval)
of Promotional Practices Sheets.)

REQUEST OF UNION ELECTRIC COMPANY
FOR ADDITIONAL TIME TO RESPOND
TO FILING OF LACLEDE GAS COMPANY

Comes now Union Electric Company (UE), pursuant to the Commission's Rules of Practice and Procedure, 4 CSR 240-2.050(4)(A) and 4 CSR 240-2.080(9), and for its Request for Additional Time to Respond to Filing of Laclede Gas Company, states to the Commission as follows:

1. On January 14, 1991, UE filed with the Commission its "Application of Union Electric Company for Variance from Promotional Practices Rule for Good Cause Shown and for Approval of Promotional Practices Sheets."

2. On January 28, 1991, Laclede Gas Company (Laclede) filed with the Commission its "Application of Laclede Gas Company for Leave to Intervene; Motion to Dismiss the Application of Union Electric Company for Variance from Promotional Practices Rule for Good Cause Shown and for Approval of Promotional Practices Sheets; and Alternative Request for Hearing."

3. Pursuant to Rule 4 CSR 240-2.080(9), UE has until February 7, 1991, to file its response to Laclede's motion.

4. UE requests an additional seven (7) days, until February 14, 1991, to file its response to Laclede's motion.

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a. UE received Laclede's motion on January 30, 1991, and distributed copies within the Company on January 31, 1991.

b. Laclede's motion is more lengthy than UE's application (including the accompanying affidavit). Laclede's motion raises a number of legal, technical and philosophical objections to the subject of UE's application. UE needs the additional time to study Laclede's objections and respond in a comprehensive manner.

c. At this very early stage of the application process, UE does not believe the grant of a seven-day extension will unduly delay the application process or prejudice the rights or interests of Laclede or any other party.

WHEREFORE, for the reasons stated above, Union Electric Company respectfully requests that the Commission issue its order granting it seven (7) additional days, to February 14, 1991, to file its response to Laclede's motion.

Respectfully submitted,
UNION ELECTRIC COMPANY

Michael F. Barnes

Michael F. Barnes
Attorney
Union Electric Company
P.O. Box 149
St. Louis, Mo. 63166
(314) 554-2552

Dated: February 4, 1991

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served on the parties listed below, by enclosing the same in an envelope addressed to such parties at their respective addresses, with postage fully prepaid, and by depositing said envelopes in the United States mail in St. Louis, Missouri, this 4th day of February, 1991.

Michael F. Barnes

Michael F. Barnes

Mary Ann Young
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo. 65102

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