

May 16, 2002

**VIA HAND DELIVERY**



Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Jefferson City, MO 65101

Re: MPSC Case No. EC-2002-1025

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Request for Additional Time to File Response**.

Very truly yours,

*James J. Cook /sk*

James J. Cook  
Managing Associate General Counsel

JJC/www

Enclosures

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

The Staff of the Missouri Public	)	
Service Commission,	)	
	)	
Complainant,	)	
	)	
	)	
v.	)	Case No. EC-2002-1025
	)	
	)	
Union Electric Company, d.b.a.	)	
AmerenUE	)	
	)	
Respondent.	)	

**REQUEST FOR ADDITIONAL TIME**  
**TO FILE RESPONSE**

COMES NOW Union Electric Company, d/b/a AmerenUE (“the Company” or “UE”), pursuant to 4 CSR 240-2.080, and requests that the Commission allow five days for the Company to respond to the Missouri Public Service Commission Staff (“Staff”) and the Office of Public Counsel (“OPC”) filings concerning the procedural schedule for the 6<sup>th</sup> Sharing Period matter and the related complaint cases.

In its filing of May 6, 2002, the Staff proposed a new schedule for this matter. On May 10, 2002, OPC indicated in its filings, that it supported the Staff’s new proposed schedule. The Company has not responded to that new proposal.

The Company, the Staff, and OPC have been in discussions concerning various aspects of this matter, including the merits of the matter and scheduling issues. To facilitate these discussions, with minimal impact on the timing of the ultimate resolution of these cases, the Company requests that the Commission refrain from acting on the

proposed schedules for the time being, and the Company be given an additional five days until May 21, 2002 to respond to the new schedules proposed by the Staff and OPC.

The undersigned has been authorized by attorneys for the Staff to indicate that the Staff has no objection to this request.

WHEREFORE, the Company hereby requests an additional five days in which to respond to the Staff and OPC proposed schedules in these matters.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By: James J. Cook / sh  
James J. Cook, MBE #22697  
Managing Associate General Counsel

Steven R. Sullivan, MBE #33102  
Vice President, General Counsel  
& Secretary

One Ameren Plaza  
1901 Chouteau Avenue  
P. O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

jjcook@ameren.com  
314-554-2237

srsullivan@ameren.com  
314-554-2098  
(314) 554-4014 (fax)

OF COUNSEL:  
Robert J. Cynkar  
Victor J. Wolski  
Cooper & Kirk  
1500 K Street, N.W.  
Suite 200  
Washington, D.C. 20005  
202-220-9600  
202-220-9601 (fax)

DATED: May 16, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via Hand Delivery or U.S. Mail on this 16<sup>th</sup> day of May, 2002, on the following parties of record:

John B. Coffman  
Office of the Public Counsel  
P. O. Box 7800  
Jefferson City, MO 65102

Diana M. Vulysteke  
Bryan Cave LLP  
One Metropolitan Square  
211 North Broadway, Ste. 3600  
St. Louis, MO 63102-2750

Steve Dottheim  
Office of the General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

General Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Governor Office Building  
Jefferson City, MO 65101

Ronald Molteni  
Office of the Attorney General  
221 W. High Street, P.O. 899  
Jefferson City, MO 65101

Robert C. Johnson/Lisa Langeneckert  
Peper, Martin, Jensen, Maichel & Hetlage  
720 Olive Street, 24<sup>th</sup> Floor  
St. Louis, MO 63101

Robin E. Fulton/R. Scott Reid  
Schnapp, Fulton, Fall, McNamara  
& Silvey L.L.C.  
135 E. Main Street, Box 151  
Fredericktown, MO 63645-0151

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
Jefferson City, MO 65101

Gary W. Duffy/James Swearengen  
Brydon, Swearengen & England PC  
312 E. Capitol Ave., P.O. Box 456  
Jefferson City, MO 65102

Paul H. Gardner  
Goller, Gardner & Feather  
131 East High Street  
Jefferson City, MO 65101

James J. Cook / sh  
James J. Cook