

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

In re: Union Electric Company's)	
2005 Utility Resource Filing pursuant to)	Case No. EO-2006-0240
4 CSR 240 – Chapter 22)	

AMERENUE'S REQUEST FOR AN EXTENSION OF TIME

COMES NOW Union Electric Company d/b/a AmerenUE (the Company or AmerenUE) pursuant to 4 CSR 240-22.080(12) and for its Request for an Extension of Time, states as follows:

1. On December 5, 2005, AmerenUE filed its Integrated Resource Plan (IRP) pursuant to the rules on Electric Utility Resource Planning, 4 CSR 240-22.010 *et seq.*
2. These rules required the Missouri Public Service Commission Staff (the Commission and Staff, respectively) to file a report not later than 120 days after the utility's IRP filing. The rule also allows the Office of Public Counsel (OPC) and all intervenors to file a report on the same date. A motion for an extension of this time was filed by OPC. This motion was not opposed by the Company. On March 22, 2006, the Commission granted the motion for additional time and gave all parties in the case an additional 45 days to file their reports.
3. On May 19, 2006, reports identifying alleged deficiencies in the Company's IRP filing were filed by the Staff, OPC and some of the intervenors in this case.
4. 4 CSR 240-22.080(8) requires the Company, Staff, OPC and intervenors to work toward a joint agreement on a plan to remedy any alleged deficiencies within 45 days after the responses are filed, and to report to the Commission within that same 45-day period if full agreement cannot be reached. In the event that a joint agreement (in whole or in part) cannot be reached, 4 CSR 240-22.080(9) allows all parties to file comments in response to the identified deficiencies within 60 days of the filing of the reports by Staff, OPC and other intervenors.

5. The parties have met to work toward a plan to remedy the alleged deficiencies. However, an agreement has not yet been reached and, because of scheduling complications, the parties were not able to meet again before the 45-day period specified by 4 CSR 240-22.080(8) expires on July 3, 2006. The parties desire the opportunity to continue working toward an agreement to resolve this case.

6. AmerenUE requests the Commission extend the deadline for negotiating an agreement until August 4, 2006. During this additional time, all parties intend to continue working toward a joint agreement to remedy the alleged deficiencies in the AmerenUE IRP plan. Several meetings have already been scheduled for that purpose. In addition, the Company asks that the Commission order that the 60-day period for filing its comments to Staff, OPC and intervenor reports and for their responses to each other's reports be extended until September 15, 2006. Due to the large volume of comments received, the additional time will allow AmerenUE and any other party who chooses to file, the time to address all of the alleged deficiencies as is necessary.

7. AmerenUE makes this request for several reasons. First, the reports filed by Staff, OPC and intervenors contain a large volume of alleged deficiencies, the sheer number and detailed nature of which will require lengthy and involved discussions to resolve. Second, the Company faces this work while it is undertaking the preparation of a rate case which will result in a comprehensive review of the Company's cost of service and earnings. The Company notes it has committed to filing this rate case on or before July 10, 2006.

8. 4 CSR 240-22.080(12) provides that any of the time periods contained in the IRP rules may be extended by the Commission for good cause shown. The Company respectfully submits that the foregoing reasons constitute good cause to grant the extension of time requested herein.

9. Staff, OPC, the Missouri Department of Natural Resources, the Sierra Club, the Missouri Coalition for the Environment, the Missouri Nuclear Weapons Education Fund, the Association of Community Organizations for Reform Now, the Mid-Missouri Peaceworks, the Missouri Energy Group, the Missouri Industrial Energy Consumers and Noranda Aluminum, Inc. have each indicated that they do not oppose AmerenUE's request for an extension of these dates.

WHEREFORE, AmerenUE respectfully requests that the Commission extend the deadline for all parties to work toward reaching a joint agreement and to make the filing contemplated by 4 CSR 240-22.080(9) if a full agreement cannot be reached until August 4, 2006. The Company also requests that the Commission extend the deadline, in the event a full agreement is not reached, for the filing by the Company of its comments and the filing by others of their responses to the May 19, 2006 comments until September 15, 2006.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

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Dated: July 2, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Request for an Extension of Time was served on the following parties via electronic mail (e-mail) or via regular mail on this 2nd day of July, 2006.

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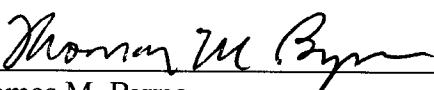
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