

Eric E. Vickers, Personally and on Behalf of all
Customers of Ameren Missouri Who Have
Sought Relief Under the Cold Weather Rule,

Complainant,

VS.

Union Electric dba Ameren Missouri and
Missouri Public Service Commission,

Defendants.

Case No. EC-2011-0326

STAFF'S MOTION FOR LEAVE TO FILE OUT-OF-TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its Motion for Leave to File Out-of-Time, states as follows:

1. On September 20, 2011, the Commission directed that each party herein file, by October 17, 2011, a statement disclosing the identity and biographical background of each witness it proposes to tender at the evidentiary hearing on October 31, 2011.
2. On the same date, the Commission directed that the parties cooperate in preparing and that Staff file, also by October 17, a list of witnesses with the order in which they will appear, and a proposed order of cross-examination for each witness.
3. Due to the unexpected illness of the undersigned, Staff did not accomplish either of these assignments by October 17.

4. Staff now seeks leave to file its Witness Statement and the Joint Witness List.

WHEREFORE, Staff prays that the Commission will grant it leave to file its Witness Statement and the Joint Witness List out-of-time, and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **20th day of October, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson