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Missouri Public Service Commission

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April 11, 2002

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. PRENGER
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³
APR 11 2002
Missouri Public
Service Commission

RE: Case No. EO-2002-351

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION AND MOTION FOR EXPEDITED TREATMENT.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates
Associate General Counsel
(573) 751-7434
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
APR 11 2002

Missouri Public
Service Commission

In the Matter of the Application of Union)
Electric Company for Permission and)
Authority to Construct, Operate, Own, and)
Maintain a 345 Kilovolt Transmission)
Line in Maries, Osage, and Pulaski)
Counties, Missouri ("Callaway-Franks)
Line").)

Case No. EO-2002-351

STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION AND
MOTION FOR EXPEDITED TREATMENT

COMES NOW the Staff of the Public Service Commission ("Staff") and for its *Motion for Extension of Time to File Recommendation and Motion for Expedited Treatment* states to the Missouri Public Service Commission ("Commission") as follows:

1. On March 8, 2002 the Commission, in its *Order Directing Filing*, directed Staff to "file a recommendation no later than April 15, 2002" in this matter. On March 22, 2002, the Commission directed that a public hearing in this matter be held in Linn, Missouri on April 22, 2002.

2. Staff believes that it would be most important to have the input of the general public at the public hearing before it files its *Recommendation* in this matter.

3. 4 CSR 240 2.050(3) provides that "[w]hen an act is required or allowed to be done by order or rule of the commission at or within a specified time, the commission, at its discretion, may -- (A) Order the period enlarged before the expiration of the period originally prescribed...." Staff requests that the Commission grant it until April 29, 2002 to file the *Recommendation*. Counsel for Staff has contacted counsel for the Office of the Public Counsel, who has no objection to this request. Counsel for Staff has also contacted counsel for Union

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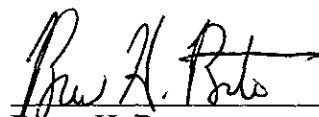
Electric Company, on April 9, and then again on April 10, 2002, but he has been unable to obtain an answer from his client as of the time of the filing of this motion.

4. Staff would request that the Commission grant this motion expedited treatment, before April 15, 2002, due to the time restraints involved. This motion was filed as soon as practicable.

WHEREFORE, the Staff prays that the Commission grant its *Motion for Extension of Time to File Recommendation and Motion for Expedited Treatment*.

Respectfully submitted,

DANA K. JOYCE
General Counsel

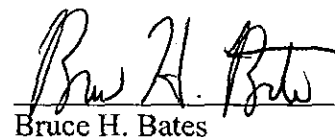


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel or parties of record as shown on the attached service list this 11th day of April 2002.



Bruce H. Bates

**Service List for
Case No. EO-2002-351
April 11, 2002 (lb)**

**Office of the Public Counsel
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Jefferson City, MO 65102**

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Union Electric Company, d/b/a AmerenUE
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