



Mel Carnahan
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Office of the Public Counsel

Harry S Truman Building Suite - 250 P.O. Box 7800 Jefferson City, Missouri 65102

July 12, 1999

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

RE: Union Electric Company, Case No. EM-96-149 FILED
JUL 1 2 1999

Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 14 copies of **Public Counsel's Responses to Union Electric Company's Request for Amendment of Briefing Schedule**. Please "file stamp" the extra enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

John B. Coffman /

Deputy Public Counsel

JBC:kh

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JUL 1 2 1999

In the Matter of the Application of) Missouri Public
Union Electric Company for an Order	Missouri Public Service Commission
Authorizing: (1) Certain Merger)
Transactions Involving Union Electric)
Company; (2) The Transfer of Certain) Case No. EM-96-149
Assets, Real Estate, Leased Property,)
Easements and Contractual Agreements)
to Central Illinois Public Service Company;)
and (3) In Connection Therewith, Certain)
Other Related Transactions.)

PUBLIC COUNSEL'S RESPONSE TO UNION ELECTRIC COMPANY'S REQUEST FOR AMENDMENT OF BRIEFING SCHEDULE

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response states as follows:

- 1. On July 7, 1999, Union Electric Company (Company) filed an unopposed request for an amendment of the briefing schedule, essentially extending the deadline for initial briefs by two weeks and postponing the deadline for reply briefs by only one week. Public Counsel joins in this request.
- 2. Counsel for Public Counsel in this matter is also the attorney assigned to the Western Resources/Kansas City Power and Light merger application case before the Commission and before the Federal Energy Regulatory Commission, as well as the attorney assigned to the St. Joseph Light and Power Company electric case, and other Commission cases that require serious attention this month. While it was hoped that an extension of the briefing schedule would not be needed, the reasonable extension of one week for the conclusion of briefing in this case is necessary to ensure that all issues in this case can be adequately addressed.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY:

John B. Coffman (Bar No/ \$6591)

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been either faxed, mailed, or hand-delivered to to all counsel of record on this 12th day of July, 1999?