

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission and)
Approval and a Certificate of Public)
Convenience and Necessity Authorizing)
it to Construct, Install, Own,) File No. EA-2012-0281
Operate, Maintain, and Otherwise Control and Manage)
A Utility Waste Landfill and Related Facilities at its)
Labadie Energy Center.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
THE LABADIE ENVIRONMENTAL ORGANIZATION'S
AND SIERRA CLUB'S MOTION TO DISMISS**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"),
by and through counsel, and hereby files this Unopposed Motion for Extension of Time to
respond to the Motion to Dismiss filed by the Labadie Environmental Organization ("LEO") and
Sierra Club. In this regard, Ameren Missouri states as follows:

1. On March 26, 2013, LEO and Sierra Club filed a Motion to Dismiss, claiming the
Commission lacks jurisdiction in this case. Under 4 CSR 240-2.080(15), the default time for
response is 10 days, which would ordinarily make a response due on Friday, April 5, 2013.

2. The undersigned counsel was out of the office on vacation when the Motion to
Dismiss was served last week, and consequently has only had a couple of days to review and to
begin addressing the Motion. The Motion to Dismiss contains many assertions regarding the
Commission's jurisdiction. Consequently, the undersigned requests that the Commission afford
Ameren Missouri or any other party wishing to respond an additional three business days to
respond -- to Wednesday April 10, 2013.

3. The undersigned counsel has contacted counsel for the other parties to this case,
all of whom have authorized the undersigned counsel to indicate that they do not oppose this
request.

4. This request will not prejudice any party or the Commission, particularly given the timing of key events in the procedural schedule jointly proposed by the parties and adopted by the Commission.

WHEREFORE, Ameren Missouri respectfully requests that the Commission extend the deadline for filing responses to the LEO's and Sierra Club's Motion to Dismiss to Wednesday, April 10, 2013.

Respectfully submitted,

/s/ James B. Lowery

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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via e-mail to the following on April 3, 2013:

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/s/ James B. Lowery
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