

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
AUG 21 2002

Missouri Public
Service Commission

STERLING MOODY, STERLING'S MARKET
PLACE AND STERLING'S PLACE, I,

Complainants,

v.

AMERENUE, UNION ELECTRIC CO. d/b/a
AMERENUE, and MIKE FOY, LEROY ETTLING,
and SHERRY MOSCHNER, as employees of
AmerenUE,

Respondents.

Case No. EC-2002-112

**JOINT MOTION FOR EXTENSION OF TIME TO
FILE BRIEF AND PROPOSED FINDINGS AND
CONCLUSIONS AND REQUEST FOR EXPEDITED TREATMENT**

Come now complainants, Sterling Moody, Sterling's Marketplace and Sterling's Place I, and respondents, Union Electric Company d/b/a AmerenUE, Mike Foy, Leroy Ettling and Sherry Moschner, and for their Joint Motion for Extension of Time to File Brief and Proposed Findings and Conclusions, pursuant to 4 CSR 240-2.050(3)(A), state as follows:

1. Pursuant to the July 16 Scheduling Order, the parties' initial briefs and proposed findings of fact and conclusions of law are due to be filed on or before August 22, 2002.
2. Also pursuant to said Scheduling Order, the parties' reply briefs are due to be filed on or before September 3, 2002.
3. Due to the present work load and responsibilities of the parties' counsel, the parties are requesting an extension of time in which to file their initial and reply briefs, and their proposed findings of fact and conclusions of law.

4. Neither the Staff of the Commission nor the Office of Public Counsel have an objection to this request.

5. This request for extension of time is being made in good faith and not for purposes of delay and an extension will not have a negative effect on the parties, respondent AmerenUE's customers or the general public.

6. The parties respectfully request expedited consideration of their joint motion pursuant to 4 CSR 240-2.080(16) and that a ruling be made no later than August 21, 2002. There will be no negative effect on respondent AmerenUE's customers or the general public if such action is taken.

WHEREFORE, complainants and respondents respectfully request that the Scheduling Order be amended so as to require the parties to file their initial briefs and proposed findings of fact and conclusions of law on or before 4:00 p.m. on September 9, 2002, that the parties be required to file their reply briefs on or before 4:00 p.m. on September 23, 2002, and for such other and further relief as the Commission deems appropriate.

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Joint Motion for Extension of Time to File Brief and Proposed Findings and Conclusions and Request for Expedited Treatment was sent by facsimile and mailed, first-class, postage prepaid this ____ day of August 2002 to John B. Coffman, Office of Public Counsel, 200 Madison Street, Suite 650, Jefferson City, Missouri 65102 and Victoria Kizito, Office of General Counsel, Missouri Public Service Commission, 260 Madison Street, Jefferson City, Missouri 65102.

Michael A. Vitale / sh