

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

In re: Union Electric Company's 2005	)	
Utility Resource Filing pursuant to	)	Case No. EO-2006-0240
4 CSR 240 – Chapter 22	)	

**REQUEST FOR EXTENSION OF TIME**

COMES NOW the Office of the Public Counsel and for its reply states as follows:

1. On December 5, 2005, AmerenUE filed its Integrated Resource Plan (IRP) pursuant to Chapter 22 of the Commission's rules. According to 4 CSR 240-22.080(5) and (6), the other parties would have until April 4, 2006 to respond to AmerenUE's filing.

2. Public Counsel requests a 45-day extension of that deadline for all parties for the following reasons:

- meetings scheduled at AmerenUE to discuss the filing were delayed for a month while confidentiality concerns were addressed;
- concerns about the "Highly Confidential" designation given to the filing caused it to be re-filed on February 10 and 15, 2006;
- the parties have not responded to an IRP for a number of years, and internal processes need to be re-established;
- additional portions of the IRP filing – and thus the responses parties are preparing – may be made public pursuant to the filing made by the Sierra Club *et al.* on March 16, 2006; and
- recent electric rate case filings, cost of service filings, rule drafting activities and other matters have drawn off resources needed to address AmerenUE's IRP.

3. All of the other parties, including AmerenUE, have indicated that they either do not oppose this request or that they support it.

WHEREFORE, Public Counsel respectfully requests that the Commission extend the

deadline for parties to respond to AmerenUE's Integrated Resource Plan by 45 days until May 19, 2006.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:\_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties this 20<sup>th</sup> day of March 2006.

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