

The Staff of the Missouri Public Service
Commission,

Complainant,

VS.

Union Electric Company d/b/a
Ameren Missouri,

Respondent.

Case No. EC-2015-0315

**MOTION TO EXTEND DUE DATE FOR REPLIES TO RESPONSES
TO MOTIONS FOR SUMMARY DETERMINATION**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and, with the agreement of all of the parties to this docket, hereby requests that the due date for replies to the two motions for summary determination filed in this case be extended to this Friday, September 25, 2015 and, in this regard, states as follows:

1. The Staff, on behalf of all of the parties, previously submitted a jointly proposed procedural schedule calling for the filing of motions for summary determination, responses to said motions and replies to said responses. The Commission adopted the parties' agreement.
2. By agreement, the dates in the originally-proposed procedural schedule were changed, and the Commission adopted the modified agreement.
3. At the request of the undersigned counsel due to the press of other commitments, the parties have now agreed to one additional minor change in the schedule, that is, to move the due date for all replies to the two summary determination motions that have been filed from Wednesday, September 23, 2015, to Friday, September 25, 2015. The new date precedes the date for the oral argument set for this matter by one full week.

WHEREFORE, Ameren Missouri moves for an order extending the due date for replies to the two summary determination motions that have been filed to Friday, September 25, 2015.

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery

James B. Lowery, #40503
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
(573) 443-3141
(573) 442-6686 (Facsimile)
lowery@smithlewis.com

Wendy K. Tatro, #60261
Director-Asst. General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
Phone (314) 554-3484
Facsimile (314) 554-4014
amerenmissouriservice@ameren.com
Attorneys for Union Electric Company
d/b/a Ameren Missouri

Dated: September 22, 2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 22nd day of September, 2015, served the foregoing document and its attachment either by electronic mail, or by U. S. Mail, postage prepaid addressed to all parties of record.

/s/ James B. Lowery
James B. Lowery