

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

In the Matter of the Application of	)	
Union Electric Company for Authority	)	
To Continue the Transfer of	)	Case No. EO-2011-0128
Functional Control of Its Transmission	)	
System to the Midwest Independent	)	
Transmission System Operator, Inc.	)	

**REQUEST FOR ADDITIONAL EXTENSION OF TIME**

COMES NOW the Office of the Public Counsel and for its Request for Additional Extension of Time states as follows:

1. In a joint filing made on January 3, the parties asked that they be allowed additional time until January 24 to file a proposed procedural schedule. In that filing the parties represented that:

[T]here is a reasonable likelihood that, as far as most of the parties were concerned, a formal procedural schedule and evidentiary hearing on the Application would not be required. The parties further noted that, even if they are unable to resolve their concerns and a formal schedule does become necessary, there still remains sufficient time to request that a formal schedule be established to pre-file testimony, hold a hearing, and to allow the Commission a reasonable amount of time to deliberate and render a decision prior to the expiration of Ameren Missouri's current permission to participate in the Midwest Independent Transmission Operator, Inc. ("Midwest ISO").<sup>1</sup>

2. Due to the press of other matters, including but not limited to the Kansas City Power & Light and KCP&L-GMO hearings, the parties have not yet been able to have discussions to determine whether this case can be resolved by agreement or whether formal proceedings will be necessary. Public Counsel believes that a further extension until February 11 will allow sufficient time for these discussions to take place. Public Counsel therefore requests that the Commission allow until February 11 for the filing of a proposed procedural schedule, a Stipulation and Agreement, or a report on the status of the parties' discussions.

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<sup>1</sup> The MoPSC Order dated September 9, 2008 granted AmerenMO continued participation in the Midwest ISO through April 30, 2012.

3. All of the other parties to this case either support or have affirmatively represented that they do not oppose this further extension.

WHEREFORE, Public Counsel respectfully requests that the Commission grant an additional extension of time until February 11, 2011 for the filing of a proposed procedural schedule, a Stipulation and Agreement, or a report on the status of the parties' discussions.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/S/ LEWIS R. MILLS, JR.**

BY: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been emailed this 4<sup>th</sup> day of February 2011 to all parties of record.

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**/s/ Lewis R. Mills, Jr.**

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