

In Re: Union Electric Company's )  
2008 Utility Resource Filing Pursuant ) **Case No. EO-2007-0409**  
to 4 CSR 240- Chapter 22 )

COMES NOW The Office of the Public Counsel and for its Motion for Expansion of Response Time states as follows:

1. Pursuant to 4 CSR 240-22.080(9), Union Electric Company d/b/a AmerenUE filed comments in response to other parties' comments on September 12, 2008.
2. Pursuant to 4 CSR 240-2.080(15), Public Counsel would generally have until September 22 to respond to AmerenUE's September 12 filing. 4 CSR 240-2.080(15) provides that the Commission may establish a longer or shorter response time as circumstances dictate.
3. Public Counsel requests that it (and other parties) be allowed until September 26 to file its response. This minimal expansion of time is warranted by the following:
  - A. Much of the ten day period allowed by the rules has been occupied with the technical conference and local public hearings in AmerenUE's rate case, ER-2008-0318;
  - B. AmerenUE's September 12 filing is quite lengthy and raises a number of legal and technical issues;
  - C. The Commission's decision on issues raised by Public Counsel's (and other parties') unresolved deficiencies and AmerenUE's September 12 response have far-reaching consequences that will bear on other Integrated Resource Planning cases for AmerenUE and the other Missouri electric utilities;

- D. AmerenUE's September 12 response sets forth a number of proposed remedies for the unresolved deficiencies; and
- E. The benefit to the Commission, and ultimately the public interest, from having a thoughtful and complete response far outweighs any perceived advantage to AmerenUE expediting the Commission's review of AmerenUE's IRP filing and parties' responses to that filing.

WHEREFORE Public Counsel respectfully requests that the Commission allow all parties until September 26, 2008 to respond to other parties' September 12, 2008 filings.

Respectfully submitted,

OFFICE OF THE Public Counsel

By: /s/ Lewis R. Mills, Jr.  
Lewis R. Mills, Jr. (#35275)  
Public Counsel  
P O Box 2230  
Jefferson City, MO 65102  
(573) 751-1304  
(573) 751-5562 FAX  
[lewis.mills@ded.mo.gov](mailto:lewis.mills@ded.mo.gov)

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties this 16<sup>th</sup> day of September 2008.

General Counsel Office  
Missouri Public Service  
Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
GenCounsel@psc.mo.gov

Mills Lewis  
Office Of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opcservice@ded.mo.gov

Dottheim Steve  
Missouri Public Service  
Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Steve.Dottheim@psc.mo.gov

Boudreau A Paul  
Aquila Networks  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102  
PaulB@brydonlaw.com

Morrison A Bruce  
Association of Community  
Organizations for Reform Now  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
bamorrison@greatriverslaw.org

Robertson B Henry  
Association of Community  
Organizations for Reform Now  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
hrobertson@greatriverslaw.org

Henry G Kathleen  
Association of Community  
Organizations for Reform Now  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
khenry@greatriverslaw.org

Morrison A Bruce  
Mid-Missouri Peaceworks  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
bamorrison@greatriverslaw.org

Robertson B Henry  
Mid-Missouri Peaceworks  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
hrobertson@greatriverslaw.org

Henry G Kathleen  
Mid-Missouri Peaceworks  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
khenry@greatriverslaw.org

Morrison A Bruce  
Missouri Coalition for the  
Environment  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
bamorrison@greatriverslaw.org

Robertson B Henry  
Missouri Coalition for the  
Environment  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
hrobertson@greatriverslaw.org

Henry G Kathleen  
Missouri Coalition for the  
Environment  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
khenry@greatriverslaw.org

Woods A Shelley  
Missouri Department of Natural  
Resources  
P.O. Box 899  
Jefferson City, MO 65102-0899  
shelley.woods@ago.mo.gov

Langeneckert C Lisa  
Missouri Energy Group  
One City Centre, 15th Floor  
515 North Sixth Street  
St. Louis, MO 63101  
llangeneckert@spvg.com

Downey F Edward  
Missouri Industrial Energy  
Consumers  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
efdowney@bryancave.com

Vuylsteke M Diana  
Missouri Industrial Energy  
Consumers  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
dmvuylsteke@bryancave.com

Healy Douglas  
Missouri Joint Municipal Electric  
Utility Commission  
939 Boonville Suite A  
Springfield, MO 65802  
doug@healylawoffices.com

Kincheloe E Duncan  
Missouri Joint Municipal Electric  
Utility Commission  
1808 I-70 Dr. SW  
Columbia, MO 65203  
dkincheloe@mjmeuc.org

Conrad Stuart  
Noranda Aluminum, Inc.  
3100 Broadway, Suite 1209  
Kansas City, MO 64111  
stucon@fcplaw.com

Morrison A Bruce  
Sierra Club  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
bamorrison@greatriverslaw.org

Robertson B Henry  
Sierra Club  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
hrobertson@greatriverslaw.org

Henry G Kathleen  
Sierra Club  
705 Olive Street, Suite 614  
St. Louis, MO 63101  
khenry@greatriverslaw.org

Sullivan R Steven  
Union Electric Company  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1300)  
St. Louis, MO 63166-6149  
srsullivan@ameren.com

Byrne M Thomas  
Union Electric Company  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 131)  
St. Louis, MO 63166-6149  
tbyrne@ameren.com

Tatro Wendy  
Union Electric Company  
1901 Chouteau Avenue  
St. Louis, MO 63166-6149  
wtatro@ameren.com

By:       /s/ Lewis R. Mills, Jr.