

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

In the Matter of the Joint Application of Union Electric)
Company, d/b/a AmerenUE, and Pemiscot-Dunklin)
Electric Cooperative, Inc. for an Order Approving the)
Change in Electric Supplier for Certain Customers,)
Authorizing the Sale, Transfer and Assignment of)
Certain Electric Distribution Facilities and Easements)
from AmerenUE to Pemiscot-Dunklin Electric)
Cooperative and Approving the Territorial Agreement)
Between AmerenUE and Pemiscot-Dunklin Electric)
Cooperative in Dunklin County, Missouri)

Case No. EO-2008-0310

REQUEST FOR EXTENSION OF TIME TO FILE
STAFF’S INVESTIGATION AND REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Request For Extension Of Time To File Staff’s Investigation And Report, respectfully states as follows:

1. On March 28, 2008, Union Electric Company, d/b/a AmerenUE (AmerenUE) and Pemiscot-Dunklin Electric Cooperative, Inc., (Pemiscot-Dunklin) submitted a Joint Application to the Missouri Public Service Commission (Commission).
2. The parties seek Commission approval for a change in the electric supplier for 2,700 Dunklin County customers from AmerenUE to Pemiscot-Dunklin, approval for the sale of certain AmerenUE assets to Pemiscot-Dunklin, and approval of a territorial agreement between the parties.
3. The Commission issued its Order And Notice on April 1, 2008, allowing interested parties 20 days to file a motion for leave to intervene. The Commission received no intervention requests.

4. On April 22, 2008, the Commission issued an Order Directing Filing, ordering Staff to file a Recommendation no later than May 12, 2008.
5. Due to the various issues presented in this case, Staff requests an extension of 30 days from May 12, 2008, to allow a complete and thorough investigation, and adequately prepare a report with all applicable information.
6. Pursuant to 393.190.1 RSMo (2000), “[n]o....electrical corporation....shall hereafter sell....the whole or any part of its franchise, works or system, necessary or useful in the performance of its duties to the public....without having first secured from the commission an order authorizing it so to do.”
7. AmerenUE is seeking to transfer \$3,732,000 in assets to Pemiscot-Dunklin.
8. Pursuant to Section 393.106.2 RSMo (2000), “[t]he public service commission, upon application made by an affected party, may order a change of suppliers on the basis that it is in the public interest for a reason other than a rate differential.”
9. Under the Joint Application, the parties seek approval for a change in electric supplier for 2,700 Dunklin County customers from AmerenUE to Pemiscot-Dunklin.
10. Pursuant to Sections 394.312.1 and 394.312.3 RSMo (2000), “[c]ompetition to provide retail electric service, as between rural electric cooperatives, [and] electrical corporations....may be displaced by written territorial agreements” and “the commission shall rule on such applications [for territorial agreements] not later than one hundred twenty days after the application is properly filed with the secretary of the commission.”
11. In the Joint Application, the parties have specifically designated the boundaries of the exclusive electric service area of each party following completion of this transaction.

12. Staff's suggested extension until June 11, 2008, will allow forty-five (45) days for the Commission to issue its order approving or rejecting the Joint Application.

13. Pursuant to Section 394.312 RSMo (2007), "[t]he commission shall hold evidentiary hearings to determine whether such territorial agreements should be approved or disapproved, except that in those instances where the matter is resolved by a stipulation and agreement submitted to the commission by all the parties such hearings may be waived by agreement of the parties."

14. Mr. John Dalton, Jr., counsel for Pemiscot-Dunklin, and Ms. Wendy Tatro, counsel for AmerenUE do not object to Staff's suggested extension until June 11, 2008.

WHEREFORE, Staff respectfully requests the Commission to allow Staff additional time to file Staff's Investigation And Report, with a filing deadline of June 11, 2008.

Respectfully submitted,

/s/ Jennifer Hernandez
Jennifer Hernandez
Legal Counsel
Missouri Bar No. 59814

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was transmitted by electronic mail or facsimile to all parties of record on this 7th day of May, 2008

/s/ Dawn M. Carafeno