

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for the Issuance)	File No. EU-2012-0027
Of an Accounting Authority Order Relating to its)	
Electrical Operations.)	

MOTION FOR EXTENSION OF TIME TO FILE STIPULATION OF FACTS

COME NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”), the Staff of the Missouri Public Service Commission (“Staff”), the Office of the Public Counsel (“OPC”), the Missouri Industrial Energy Consumers (“MIEC”), and Barnes-Jewish Hospital (“BJH”) (Staff, OPC, MIEC and BJH hereinafter sometimes referred to collectively as the “Non-Company Parties”), and hereby file this *Motion for Extension of Time to File Stipulation of Facts*, and in support thereof, state as follows:

1. On November 30, 2011 the Staff, on behalf of the Non-Company Parties, requested an extension of time (to December 8, 2011) to file a full or partial Stipulation of Facts, assuming agreement could be reached on such a stipulation. As the Staff noted in its request, Ameren Missouri had provided the Non-Company parties a draft stipulation on October 13, 2011, but due to the press of other Commission business Staff had been delayed in working on the draft and in circulating the Staff’s work to the other Non-Company Parties.

2. As the Staff noted in its prior request, Ameren Missouri did not oppose the requested extension to December 8, but the undersigned counsel for Ameren Missouri had indicated to the Staff’s counsel that a greater extension might be needed depending on when the Non-Company Parties were able to communicate their response to Ameren Missouri’s October 13 draft to Ameren Missouri.

3. The Non-Company Parties responded mid-afternoon December 5, 2011, but due to other commitments, Ameren Missouri was unable to review that response and to communicate with the Non-Company Parties until this afternoon, which provided insufficient time for the Non-Company Parties to meet and confer regarding Ameren Missouri's response and to then discuss the same with Ameren Missouri.

4. As a consequence, Ameren Missouri and the Non-Company Parties request a further extension of the date for filing a stipulation of facts, full or partial, or for advising the Commission that an agreement on such a stipulation cannot be reached, to December 14, 2011. A further extension of time may require a modification of the due date for dispositive motions, as reflected in the current procedural schedule, but the remainder of the schedule is such that a modification could be accommodated without materially impacting the rest of the schedule or the ultimate hearing dates that have been reserved. The parties apologize for any inconvenience.

WHEREFORE, Ameren Missouri and the Non-Company Parties hereby request a further extension until December 14, 2011, for the filing of a stipulation of facts, full or partial, or for advising the Commission that an agreement on such a stipulation cannot be reached.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

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Dated: December 8, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 8th day of December, 2011.

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