

**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 Authority to)
Exchange SO₂ Emissions Allowances for NO_x)
Emissions Allowances.)

File No. EO-2012-0158

STAFF'S MOTION FOR MORE TIME TO FILE RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and requests the Commission grant it more time to file a recommendation based on the grounds following:

1. In its November 23, 2011, order, the Commission directed Staff to, “no later than December 5, 2011, file a recommendation regarding its examination and analysis of Ameren Missouri’s application.” Ameren Missouri filed its application on November 22, 2011.

2. As part of its examination of Ameren Missouri’s application, early this week Staff requested both a meeting with Ameren Missouri to ask questions, and workpapers supporting its application that Ameren Missouri might provide in advance of the meeting. In response, on Wednesday, November 30, 2011, in the morning, Ameren Missouri and Staff scheduled a telephone meeting for the following morning. Late that afternoon Ameren Missouri provided Staff portions of a September 29, 2011, presentation Ameren Missouri had made to Staff, together with workpapers supporting it that Staff had not seen before. During the telephone meeting held during the morning of the following day, Staff asked Ameren Missouri numerous questions, including the date by which it had to close the transaction that is the subject of its application. Ameren Missouri responded that it has until ** _____ **. Staff also requested a document which Ameren Missouri provided that afternoon.

3. While Ameren Missouri has promptly responded to the questions and requests for documents Staff has made thus far, Staff needs time beyond December 5, 2011,

to complete and “file a recommendation regarding its examination and analysis of Ameren Missouri’s application.”

4. Because Ameren Missouri did not provide any workpapers supporting its application until November 30, 2011, and the press of other matters, including, but not limited to, the impending evidentiary hearing before the Commission scheduled for December 15-16, 2011, *In the Matter of Union Electric Company’s 2011 Utility Resource Filing Pursuant to 4 CSR 240 – Chapter 22*, File No. EO-2011-0271, Staff anticipates it will need until Friday, December 20, 2011, to complete its examination and analysis of Ameren Missouri’s application and file its recommendation. Staff will not unnecessarily delay making its recommendation. However, based on what it knows now regarding the timeline for this transaction, a two-week delay in Staff making its recommendation to the Commission will neither prejudice Ameren Missouri nor consummation of the transaction.

5. Staff has contacted Ameren Missouri and is authorized by it to represent that Ameren Missouri does not object to an extension to Tuesday, December 20, 2011, for Staff to file its recommendation.

WHEREFORE, Staff moves the Commission to grant it until Tuesday, December 20, 2011, to file its recommendation on Ameren Missouri’s application.

Respectfully submitted,

/s/ Nathan Williams
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Deputy Counsel
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2nd day of December, 2011.

/s/ Nathan Williams