

**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 Functional Control of Its)
Transmission System to the Midwest)
Independent Transmission System Operator, Inc.) File No. EO-2011-0128

**MISSOURI INDUSTRIAL ENERGY CONSUMERS’
MOTION FOR LEAVE TO FILE POSITION STATEMENT OUT OF TIME**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and requests leave to file their Position Statement Out of Time.

1. On the November 17, 2011, deadline for position statements in this case, the MIEC, Staff, Ameren Missouri and Midwest ISO entered into a Non-Unanimous Stipulation to resolve the contested issues in this case. The MIEC’s delay in filing its position statement is due to the filing of this partial settlement that day and the filing of the revised list of issues.

2. Good cause exists to grant this motion. The MIEC’s Position Statement will supplement the Commission’s record for decision in this case. The Commission has postponed the evidentiary hearing, and pursuant to discussions at today’s settlement conference, the hearing may not occur until January. Accordingly, no party will be prejudiced by the filing of this pleading out of time.

WHEREFORE, the MIEC respectfully requests that the Commission allow it to file its Position Statement out of time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served via e-mail on counsel for all parties of record on this 21st day of November, 2011.

/s/ Diana Vuylsteke