BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Filing to Implement Regulatory)	
Changes in Furtherance of Energy Efficiency as)	File No. EO-2012-0142
Allowed by MEEIA.	j	

MOTION FOR EXTENSION OF TIME TO RESPOND TO PUBLIC COUNSEL'S MOTION TO ACCEPT CORRECTIONS TO OFFICE OF PUBLIC COUNSEL WITNESS DR. GEOFF MARKE'S DIRECT, REBUTTAL, AND SURREBUTTAL TESTIMONY

COMES NOW Staff of the Missouri Public Service Commission and on behalf of Ameren Missouri, by and through undersigned counsel, and hereby respectfully requests an extension of time to not later than January 16, 2015, to respond to *Public Counsel's Motion To Accept Corrections To Office Of Public Counsel Witness Dr. Geoff Marke's Direct, Rebuttal, and Surrebuttal Testimony* ("Motion") and in support thereof states as follows:

- 1. On December 31, 2014, Public Counsel filed its Motion making many significant and sweeping changes to its prefiled direct, rebuttal, and surrebuttal testimonies. Public Counsel e-mailed its supporting workpapers to counsel on Friday, January 2, 2015 at 4:52pm.
- 2. The Staff began reviewing the workpapers last week, but is unable to follow the changes in the workpapers, noting that Public Counsel's workpapers include spreadsheets that do not contain formulas embedded in the cells to determine how calculations were made. Staff met with Public Counsel on January 6 and again on January 12 to resolve matters regarding OPC's Motion. Ameren Missouri is similarly

engaged in evaluating how Public Counsel's workpapers support its proposed corrected changes.

WHEREFORE, for the reasons stated above, the Staff and Ameren Missouri respectfully request the Commission grant it an extension of time to no later than January 16, 2015 to respond to Public Counsel's Motion.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 12th day of January, 2015 to all counsel of record in this proceeding.

/s/ Robert S. Berlin