

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE for Authority to File Tariffs Increasing)	Case No. ER-2007-0002
Rates for Electric Service Provided to Customers)	
in the Company's Missouri Service Area.)	

PUBLIC COUNSEL'S MOTION TO LATE FILE TESTIMONY

COMES NOW The Office of the Public Counsel and for its Motion to Late File Testimony states as follows:

1. On September 12, 2006, the Commission issued an order establishing December 15, 2006 at 5:00 P.M. as the deadline for filing revenue requirement direct testimony.

2. Because of computer problems and formatting issues, the Direct Testimony of Public Counsel witness Ryan Kind was not filed until 5:23 P.M. on December 15, approximately 20 minutes after the deadline.

3. Because the testimony was filed on the due date and only a few minutes after the deadline, neither any party nor the Commission will be harmed by its late filing.

WHEREFORE Public Counsel respectfully requests that the Commission grant this Motion to Late File Testimony and accept the filing of the Direct Testimony of Public Counsel witness Ryan Kind.

Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ Lewis R. Mills, Jr.

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties this 19th day of December 2006.

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