

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

In the matter of the Application of	)	
Aquila, Inc. for an Accounting	)	
Authority Order Concerning Fuel	)	EU-2005-0041
Purchases	)	

**AMERENUE’S REQUEST FOR ADDITIONAL TIME TO RESPOND  
TO MOTIONS OF PUBLIC COUNSEL AND SIEUA**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”) and states as follows:

1. On August 4, 2004, Aquila, Inc. initiated this proceeding by filing an application for an Accounting Authority Order to help insulate Aquila from the impact of extraordinary fluctuations in fuel costs that it has experienced.

2. On September 2, 2004 AmerenUE filed its application to intervene in this proceeding. The Office of the Public Counsel (“Public Counsel”) and Sedalia Industrial Energy Users’ Association (“SIEUA”) filed pleadings in opposition to AmerenUE’s Application to Intervene. The Commission has not yet ruled on AmerenUE’s application.

3. On September 8, 2004, Public Counsel filed its Motion to Dismiss, or in the Alternative, Motion to Consolidate. On September 13, 2004, SIEUA filed its Motion to Dismiss or Consolidate.

4. Since AmerenUE’s application to intervene has not yet been granted, AmerenUE requests additional time beyond the ten (10) days provided by 4 CSR 240-2.080(15) to respond to the motions of Public Counsel and SIEUA. Specifically, AmerenUE requests that if its

application to intervene in this proceeding is granted, that it be permitted to respond to these motions within ten (10) days of the date its intervention is granted.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By /s/ Thomas M. Byrne  
Thomas M. Byrne, MBE No. 33340  
Attorney for  
Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-2514  
(314) 554-4014 (FAX)  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)

Dated: September 17, 2004

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 17<sup>th</sup> day of September, 2004, served the foregoing Request For Additional Time To Respond To Motions Of Public Counsel And SIEUA either by electronic means, or by U. S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission as shown below.

Mr. John Coffman  
Office of the Public Counsel  
200 Madison Street  
Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102-2230  
[opcservice@ded.state.mo.us](mailto:opcservice@ded.state.mo.us)  
[john.coffman@ded.mo.gov](mailto:john.coffman@ded.mo.gov)

Mr. Dean L. Cooper  
for Aquila, Inc.  
BRYDON, SWEARENGEN &  
ENGLAND P.C.  
312 E. Capitol Avenue  
Jefferson City, MO 65102  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

Mr. Dan Joyce  
General Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 800  
Jefferson City, MO 65101  
[d.joyce@psc.mo.gov](mailto:d.joyce@psc.mo.gov)

Mr. Steve Dottheim  
General Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 800  
Jefferson City, MO 65101  
[steve.dottheim@psc.mo.gov](mailto:steve.dottheim@psc.mo.gov)

Mr. Stu Conrad  
For Sedalia Industrial Energy Users  
Association  
3100 Broadway, Suite 1209  
Kansas City, Missouri 64111  
[stucon@fcplaw.com](mailto:stucon@fcplaw.com)

/s/ Thomas M. Byrne  
Thomas M. Byrne