

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

In the Matter of Ameren Missouri's Submission
of its 2013-2015 RES Compliance Plan

)
)

Case No. EO-2013-0503

MIEC MOTION FOR EXTENSION OF TIME TO COMMENT

COMES NOW the Missouri Industrial Energy Consumers ("MIEC"), and for its Motion for Extension, states as follows:

1. On June 19, 2013, the Commission granted the MIEC's Motion to Intervene.
2. Shortly thereafter, the MIEC's expert reviewed hard copies of Ameren Missouri's Compliance Report. The expert quickly realized that in order to fully understand the report, it would be necessary to review and understand the formulas that were used to generate the report.
3. The MIEC has requested electronic versions of the report and the formulas and, through no fault of any party, only received some or all of them today. Counsel for Ameren Missouri has also offered to conference with counsel for the MIEC and its expert for further explanations, but that conference is unlikely to occur prior to July 11, 2013.
4. MIEC's comments, if any, are due on July 12, 2013. The MIEC respectfully requests an additional three weeks to submit comments. That will enable MIEC's expert to fully understand the basis for Ameren Missouri's Compliance Plan.
5. Ameren Missouri's counsel and MDNR's counsel consent to this Motion. No other counsel has yet responded whether they consent or object, but the undersigned expects no objection from any party.

WHEREFORE, Movants respectfully request that the Commission grant this Motion and extend the comment filing deadline, for all parties, to August 2, 2013.

Respectfully submitted,

BRYAN CAVE LLP

By: s/ Edward F. Downey
Edward F. Downey, #28866
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone (573) 556-6622
Facsimile: (573) 556-7442
efdowney@bryancave.com

Diana Vuylsteke, #42419
211 N. Broadway, Suite 3600
St. Louis, MO 63102
Telephone: (314) 259-2000
Facsimile (314) 259-2020
dmvuylsteke@bryancave.com

Attorneys for The Missouri Industrial Energy
Consumers

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was mailed, electronically, to counsel of record this 9th day of July, 2013.

/s/ Edward F. Downey