

arranging with Ameren Missouri its own deposition of witness Maureen A. Borkowski as the Staff reached an agreement with Ameren Missouri was Public Counsel's own doing.

2. Time and, among other things, the fact that settlement discussions are privileged do not permit a point by point response to Public Counsel's pleading.

3. While Public Counsel castigates the Staff for using the Suggested Revised List Of Issues And Order Of Cross-Examination (a "redlined" version) for its filing, Public Counsel did not note that in its Position Statements Of The Office Of The Public Counsel, it changed its position on Issue 3 by "redlining."

4. The Staff also wishes to make the Commission and parties aware in this pleading that Staff is filing later today Staff Witness Adam C. McKinney's Second Supplemental Rebuttal Testimony and Testimony In Support Of Non-Unanimous Stipulation And Agreement. This document comprises only six (6) pages of testimony and copies of two (2) Midwest Independent Transmission System Operator, Inc. (Midwest ISO) responses to Staff Data Requests.

5. If necessary for scheduling purposes, Mr. McKinnie is not available the following dates:

November: 30

December: 5-16, 20-21

January: 11-12, 19, 25-26, 30-31

WHEREFORE, the Staff submits its response stating that it is not opposed to Public Counsel's Motion To Continue Hearing although Staff takes issue with many characterizations and representations made in Public Counsel's Motion.

Respectfully submitted,

/s/ Steven Dottheim

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Service Commission

CERTIFICATE OF SERVICE

I hereby certify that the foregoing filing of *Staff's Response To Public Counsel's Motion To Continue Hearing And Request For Expedited Treatment* was served via e-mail on counsel for all parties of record on this 18th day of November, 2011.

/s/ Steven Dottheim