

**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) **Case No. EO-2012-0142**
Allowed by MEEIA.)

MOTION FOR EXTENSION OF TIME

COMES NOW the Office of the Public Counsel ("Public Counsel") and moves this Commission for an order extending the time in which it may file its position statement and the corrected testimony of Dr. Geoff Marke by one day, up to and including December 31, 2014. In support, Public Counsel states:

1. The procedural schedule in the above-captioned matter requires position statements and pre-trial motions to be filed on or before December 30, 2014 (Doc. No. 206).
2. In preparation for the filing of Public Counsel's position statement, Public Counsel discovered methodological errors regarding free ridership and market effects estimates which impact the parties' calculations of energy savings and net shared benefits. These methodological errors appear to have been shared by other parties as well.
3. As a result of these methodological errors, Public Counsel believes almost all calculations of energy savings and net shared benefits will require downward adjustment.
4. Public Counsel must afford the Commission and the other parties with the correct calculations at the earliest possible opportunity after discovery of the errors, and so, will seek leave to file corrected testimony from Dr. Geoff Marke on December 31, 2014.
5. The timing of the discovery and the work involved in filing corrected testimony preclude its filing on December 30, 2014.

6. Further, the positions offered in Public Counsel's position statement as to issues 1, 1B, 1D, 1E and 2 are impacted by the discovery of these errors and the required recalculations.
7. Public Counsel, specifically Dr. Marke, anticipates discussing this matter at Messrs. Rogers and Voytas' earliest opportunities on December 31, 2014, if available.
8. Of course once filed, Public Counsel also will provide work papers associated with the corrected testimony for the benefit of the parties.
9. While the result of the changes required by the discovery of this error will lower existing estimates of energy savings and net shared benefits, in the unique circumstance of this case Public Counsel does not expect the change to impact the ultimate position of any of the other parties.
10. Due to the late discovery of this error, Public Counsel is unable to seek the input of counsel for the other parties regarding this request for extension of time, and so, will supplement this motion on the morning of December 31, 2014, to advise the Commission of their respective positions.
11. As the record in this matter reflects, Public Counsel has diligently pursued this case and this request is not made for the purpose of vexation or delay or with any other improper motive. The extension of time requested herein is brief – one day – and offered in the interest of ensuring a complete and accurate record for the Commission's consideration.

WHEREFORE, for good cause shown, Public Counsel requests a brief extension of time up to and including December 31, 2014, to file the corrected testimony of Dr. Geoff Marke and to file its position statement.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Tim Opitz
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 30th day of December 2014:

/s/ Tim Opitz
