

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

In the Matter of Union Electric Company,	)	
d/b/a Ameren Missouri's Tariff to Increase Its	)	<b><u>File No. ER-2011-0028</u></b>
Annual Revenues for Electric Service	)	Tariff No. YE-2011-0116

**STAFF MOTION FOR EXTENSION OF TIME FOR PARTIES  
TO FILE COST OF SERVICE REVENUE REQUIREMENT  
DIRECT CASES / PREPARED DIRECT TESTIMONY AND SCHEDULES  
FROM FRIDAY, FEBRUARY 4, 2011 TO TUESDAY, FEBRUARY 8, 2011**

Comes now the Staff of the Missouri Public Service Commission (Staff), through the Office of Staff Counsel, and files the instant Motion requesting that the Missouri Public Service Commission (Commission) extend the filing date for the filing of cost of service revenue requirement direct cases / prepared direct testimony and schedules from Friday, February 4, 2011 to Tuesday, February 8, 2011, due to the disruption in work caused by the unusually snow storm which occurred on February 1 and 2, 2011. Undersigned Staff counsel has contacted counsel for Union Electric Company, a/b/a Ameren Missouri (Ameren Missouri) and counsel for Ameren Missouri has indicated that, under the circumstances of the weather events of February 1 and 2, 2011, Ameren Missouri has no opposition to the Staff's Motion on behalf of itself and the other parties regarding the filing required for February 4, 2011. In support thereof, the Staff states as follows:

1. The Commission's November 10, 2010 Order Adopting Procedural Schedule And Establishing Test Year set February 4, 2011 as the direct case / prepared direct testimony and schedules filing date for the Staff and all other parties, except Ameren Missouri which filed its cost of service revenue requirement direct case / prepared direct testimony and schedules on September 3, 2010.

2. The Staff was working towards, and fully intending to make the required filing on February 4, 2011, when Central Missouri and Metropolitan St. Louis experienced a snow storm of unusual proportions February 1 and 2, 2011. Some Staff members assigned to the cost of service revenue requirement portion of the Staff's Ameren Missouri case are based in Central Missouri and some are based in Metropolitan St. Louis. Staff members in both Central Missouri and Metropolitan St. Louis experienced difficulties on February 1 and 2, 2011 due to the snow storm impairing or preventing them in performing work on the instant filing on part or on all of those days. Staff includes not only the technical Staff, who may be witnesses, analysts, or even management, but is also other Staff, such as Staff attorneys and clerical Staff, who for example format the contents of the Staff Report, i.e., the narrative, tables, charts, graphs, and other items. It occurred to undersigned Staff counsel that maybe individual pieces of Staff direct testimony and schedules could be filed before Tuesday, February 8, 2011, when ready, but undersigned Staff counsel was reminded that the Staff now files a Staff Cost Of Service Revenue Requirement Report in lieu of individual pieces of direct testimony and schedules.

3. On February 2, 2011, undersigned Staff counsel commenced hearing from counsel for other parties intending to file cost of service revenue requirement direct cases / prepared direct testimony and schedules, such as counsel for the Missouri Industrial Energy Consumers (MIEC), inquiring whether the Staff would be able to make the February 4, 2011 filing date because the February 1 and 2, 2011 weather conditions were creating problems for them given the impending February 4, 2011 filing deadline. Undersigned Staff counsel was able to contact some of these counsel and indicate that the Staff would contact counsel for Ameren Missouri to inquire as to Ameren Missouri's disposition to a request from the Staff for itself and all other parties respecting an extension of time from February 4, 2011 to February 8, 2011 and

that the Staff needed an extension due to the snow storm and was inclined to request an extension from the Commission.

4. The Staff would note for the Commission that in the Agreement As To Proposed Procedural Schedule, Related Procedural Items and Test Year True-Up Cut-Off Date filed on November 2, 2010 in File No. ER-2011-0028, the Staff agreed that on January 28, 2011 it would provide to the other parties its revenue requirement calculation. Thus, in the November 2, 2010 Agreement As To Proposed Procedural Schedule, Related Procedural Items and Test Year True-Up Cut-Off Date, the Staff agreed to provide on January 28, 2011 to the other parties the Staff's revenue requirement calculation a week before the agreed to filing of the Staff Cost Of Service Revenue Requirement Report on February 4, 2011, which is two weeks before the agreed to filing of the Staff Class Cost Of Service Rate Design Report on February 10, 2011. This provision of the Staff's revenue requirement calculation on January 28, 2010 was reflected in the Rate Case Timeline attached to the November 2, 2010 pleading. The Commission's November 10, 2010 Order Adopting Procedural Schedule And Establishing Test Year did not order the Staff to file its revenue requirement calculation on January 28, 2011. On January 28, 2011, the Staff e-mailed to all parties an electronic copy of the Staff's cost of service run revenue requirement calculation, including accounting schedules. The Staff advised the parties that the Staff's cost of service revenue requirement determination was subject to change between then and the required February 4, 2011 cost of service revenue requirement direct cases / prepared direct testimony and schedules filing. The Staff is unaware of any significant changes in its cost of service revenue requirement calculation since last Friday, January 28, 2011 that cumulatively have resulted in an increase in the Staff's revenue requirement determination.

5. Undersigned Staff counsel this date contacted counsel for Ameren Missouri, Mr. Thomas M. Byrne, and discussed with him the matter of the Staff's desire for an extension of the required February 4, 2011 filing date. Mr. Byrne indicated that undersigned Staff counsel could indicate in this pleading that under the circumstances of the weather events of February 1 and 2, 2011, Ameren Missouri has no opposition to the Staff's Motion on behalf of itself and the other parties to extend the filing required for February 4, 2011 to February 8, 2011 for cost of service revenue requirement direct cases / prepared direct testimony and schedules.

6. Mr. Byrne related that Ameren Missouri would like to discuss possible changes in certain other procedural dates but was not linking agreement on these other procedural dates with Ameren Missouri's non-opposition to the Staff's Motion on behalf of itself and the other parties regarding the filing required for February 4, 2011. These other dates which Ameren Missouri desires to talk about do not include any of the hearing dates. Undersigned Staff counsel indicated to Mr. Byrne that undersigned Staff counsel could only speak on behalf of the Staff, and that the Staff was willing to talk with Ameren Missouri about these other dates.

7. The Staff does not file this Motion to unduly delay these proceedings or to vex the Commission or Ameren Missouri. The Staff does not lightly make this request on behalf of itself and the other parties to this proceeding to extend the February 4, 2011 filing date to February 8, 2011 for cost of service revenue requirement direct cases / prepared direct testimony and schedules.

Wherefore the Staff files the instant Motion requesting that the Commission extend the filing date for the filing of cost of service revenue requirement direct cases / prepared direct testimony and schedules required for Friday, February 4, 2011 to Tuesday, February 8, 2011, due

to the disruption in work caused by the unusually severe snow storm which occurred on February 1 and 2, 2011.

Respectfully submitted,

/s/ Steven Dottheim

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**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 3rd day of February 2011.

/s/ Steven Dottheim