

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Tariffs to	)	<b><u>Case No. ER-2012-0166</u></b>
Increase Its Annual Revenues for	)	
Electric Service.	)	

**STAFF'S MOTION FOR EXTENSION OF TIME  
TO FILE ADDITIONAL TESTIMONY**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Additional Testimony*, states as follows:

1. The Commission issued its *Order Directing the Parties to File Additional Testimony* late in the day on August 24, 2012.

2. That order directed the parties to file, by September 7, 2012, additional direct testimony "addressing the advisability of implementing a rate stabilization mechanism as well as the evidentiary support for such a mechanism." In particular, this additional evidence must include "testimony on [returns on equity] in the last five years for the applicant as set by the Commission in the applicant's last five general rate actions; utilities in proxy groups in the applicant's last five general rate actions; retail electric suppliers nationally; as well as evidence on Treasury securities of differing maturities. Additional testimony may also address other evidentiary and policy matters relevant to the use of a rate stabilization mechanism."

3. Staff is fully engaged in preparing Surrebuttal Testimony for filing in this docket on September 7, 2012, as well as testimony and pleadings for a number of other cases, including the pair of Great Plains Energy rate cases, Case Nos. ER-2012-0174 and ER-2012-0175, and the request for interim rate relief in the rate case of

The Empire District Electric Company, Case No. ER-2012-0345. In particular, Staff's expert financial analyst, David Murray, who will have to shoulder the bulk of the work necessary to produce the additional direct testimony ordered by the Commission, is fully engaged to the point that it simply is not possible for him to meet the stated deadline. In addition to Surrebuttal Testimony in the present docket, Mr. Murray is being deposed by Ameren Missouri on August 29, 2012; will be reviewing documents for this case at Ameren Missouri's headquarters in St. Louis, Missouri, on August 30 and 31, 2012; is preparing Rebuttal Testimony for filing on September 5, 2012, in the KCPL rate case; and is preparing Rebuttal Testimony in the KCPL-GMO rate case for filing on September 12, 2012. His supervisory responsibilities require him to oversee the Financial Analysis unit's contribution to the Ameren Missouri nuclear generating plant decommissioning case stipulation and agreement and recommendation; the hearings on September 10 and 11 on the request for interim rate relief in the rate case of The Empire District Electric Company; the cost of capital section of Staff's Revenue Requirement Cost-of-Service Report for The Empire District Electric Company rate case; the financing application filed by the Laclede Gas Company; and several smaller matters.

4. In view of the press of other matters described above, Staff requests an extension of one week, up to and including September 14, 2012, within which to file the ordered additional direct testimony.

**WHEREFORE**, Staff prays that the Commission will grant it an extension of one week, up to and including September 14, 2012, within which to file the additional direct testimony ordered in its *Order Directing the Parties to File Additional Testimony* issued on August 24, 2012; and such other and further relief as is just in the circumstances.

Respectfully submitted,

**s/ Kevin A. Thompson**

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **28<sup>th</sup> day of August, 2012**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

**s/ Kevin A. Thompson**