

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

In the Matter of the Application of Union Electric )	
Company d/b/a Ameren Missouri for the Issuance )	
Of an Accounting Authority Order Relating to its )	<b>File No. EU-2012-0027</b>
Electrical Operations. )	

**MOTION FOR EXTENSION OF TIME TO FILE STIPULATION OF FACTS**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel of the Staff Counsel Department of the Missouri Public Service Commission (Commission), and on the Staff's behalf, that of the Office of the Public Counsel (OPC), the Missouri Industrial Energy Consumers (MIEC), and Barnes-Jewish Hospital (BJH), known collectively herein as the "Non-Company Parties," files this *Motion For Extension Of Time To File Stipulation Of Facts* and in support thereof states as follows:

1. On October 13, 2011, the Non-Company Parties and Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed a *Jointly Proposed Procedural Schedule (Proposed Schedule)* containing a date for the filing of a stipulation of facts, full or partial, depending on agreement among the parties. The Commission adopted the *Proposed Schedule* by *Order Adopting Procedural Schedule And Terms (Order)* on October 28, 2011. Also on said date, Ameren Missouri circulated to the Non-Company Parties a draft proposed stipulation of facts.

2. Since October 28, 2011 the Staff, for example, has been working on a draft proposed stipulation of facts. Unfortunately the press of other Commission business has prevented the Staff from (1) completing its work on the draft, (2) circulating a completed draft to the other Non-Company Parties, and (3) submitting a draft to Ameren Missouri for its review and

consideration. As a consequence, the Non-Company Parties request an extension of the date for the filing of a stipulation of facts, full or partial, until December 8, 2011.

3. The extension of time would not impede the remainder of the procedural schedule as adopted by the Commission's *Order*. The Non-Company Parties apologize for any inconvenience.

4. Counsel for Ameren Missouri has advised undersigned counsel for the Staff that Ameren Missouri does not oppose this request and suggests that a greater extension of time than requested might ultimately be necessary to reach agreement on a stipulation of facts, full or partial.

**WHEREFORE**, the Staff, on behalf of the Non-Company Parties, files this *Motion For Extension Of Time To File Stipulation Of Facts* and moves the Commission to grant an extension until December 8, 2011, for the filing of a stipulation of facts, full or partial.

Respectfully submitted,

**/s/ Steven Dottheim**

Steven Dottheim, Mo. Bar #29149  
Chief Deputy Staff Counsel  
Phone (573) 751-7489  
Facsimile (573) 751-9285  
steve.dottheim@psc.mo.gov

Jennifer Hernandez, Mo. Bar #59814  
Associate Staff Counsel  
Phone (573) 751-8706  
Facsimile (573) 751-9285  
jennifer.hernandez@ psc.mo.gov

Attorneys for the Staff of the Missouri  
Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served via e-mail on all counsel of record this 30<sup>th</sup> day of November, 2011.

**/s/ Steven Dottheim**