# 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	)	File No. EU-2012-0027
Electrical Operations	)	

### JOINT MOTION FOR EXTENSION OF TIME TO FILE LIST OF ISSUES AND STATEMENTS OF POSITIONS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through undersigned counsel, and on behalf of itself and the other parties (Union Electric Company d/b/a Ameren Missouri, Office of the Public Counsel, Missouri Industrial Energy Consumers, Inc., and Barnes-Jewish Hospital) to this proceeding files this Joint Motion For Extension Of Time To File List Of Issues And Statements Of Positions and the parties state as follows:

- 1. On October 13, 2011, the parties to this proceeding jointly proposed a procedural schedule that included, among other things, April 16, 2012 for the deadline for the filing of the List of Issues, List of Witnesses, Order of Cross-examination, and Order of Opening Statements ("List of Issues") and April 17, 2012 for the deadline for the filing of Statements of Positions.
- 2. On October 28, 2012, the Commission issued an Order Adopting Proposed Procedural Schedule And Terms in which it adopted the jointly proposed procedural schedule.
- 3. The parties have been diligently engaged in this case, various of the parties having filed surrebuttal or cross-surrebuttal testimony on April 12, 2012, and other Commission proceedings.
- 4. The parties request an extension of time until Wednesday, April 18, 2012 for the filing of the List of Issues and until Thursday, April 19, 2012 for the Statement of Positions.

5. The evidentiary proceedings in this matter are scheduled for Thursday and Friday, May 3 and 4, 2012.

**WHEREFORE**, the Staff on behalf of itself and the other parties files this pleading requesting an extension of time until Wednesday, April 18, 2012 for the filing of the List of Issues, List of Witnesses, Order of Cross-examination, and Order of Opening Statements and until Thursday, April 19, 2012 for the Statement of Positions.

Respectfully submitted,

Attorneys For Union Electric Company d/b/a Ameren Missouri

Union Electric Company, d/b/a Ameren Missouri

Thomas M. Byrne, Mo. Bar #33340 Managing Associate General Counsel 1901 Chouteau Avenue, MC-1310 P.O. Box 66149, MC-131 St. Louis, Missouri 63101-6149 (314) 554-2514 (Telephone) (314) 554-4014 (Facsimile) amerenmoservice@ameren.com

Brydon, Swearengen & England, P.C.

L. Russell Mitten, Mo. Bar #27881 312 East Capitol Avenue P.O. Box 456 Jefferson City MO 65102-0456 Phone (573)635-7166 Facsimile (573) 634-7431 mitten@brydonlaw.com Smith Lewis, LLP

James B. Lowery, Mo. Bar #40503 Suite 200, City Centre Building 111 South Ninth Street P.O. Box 918 Columbia, MO 65205-0918 Phone (573) 443-3141 Facsimile (573) 442-6686 lowery@smithlewis.com

### Attorneys for the Staff of the Missouri Public Service Commission

#### /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

Amy E. Moore, Mo Bar #61759 Legal Counsel Phone (573) 751-4140 Facsimile (573) 751-9285 amy.moore@psc.mo.gov

200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102-0360

## Attorneys for Missouri Industrial Energy Consumers, Inc. (MIEC)

Bryan Cave, LLP

Brent E. Roam, Mo. Bar #60666 Diana M. Vuylsteke, Mo. Bar #42419 211 N. Broadway, Suite 3600 St. Louis MO 63102 Phone (314) 259-2572 Facsimile (314) 552-8572 brent.roam@bryancave.com

### **Attorney for Barnes-Jewish Hospital**

Sandberg Phoenix & von Gontard P.C.

Lisa C. Langeneckert, Mo. Bar #49781 600 Washington Avenue, 15th Floor St. Louis MO 63101-1313 Phone (314) 446-4238 Facsimile (314) 241-7604 llangeneckert@sandbergphoenix.com

### Attorney for the Office of the Public Counsel

**Public Counsel** 

Lewis R. Mills, Jr., Mo. Bar #35275 P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65101 Phone (573) 751-1304 Facsimile (573) 751-5562 lewis.mills@ded.mo.gov

### **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 16th day of April, 2012.

#### /s/ Steven Dottheim