

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE for Authority to File Tariffs Increasing)	
Rates for Electric Service Provided to Customers in)	Case No. ER-2007-0002
the Company's Missouri Service Area.)	

STAFF MOTION FOR LEAVE TO FILE SURREBUTTAL TESTIMONY

Comes now the Staff of the Missouri Public Service Commission (Staff), and files this Motion For Leave To Late File Surrebuttal Testimony. Undersigned Staff counsel was engaged in processing the surrebuttal testimony of certain Staff witnesses for filing yesterday when he became aware that the Western District Court of Appeals had handed down its Opinion in *State ex rel. Sierra Club and Concerned Citizens of Platte County v. Public Serv. Comm'n*, Case No. WD66893. Due to the need to address immediate matters relating to the handing down of this Opinion in *State ex rel. Sierra Club v. PSC*, undersigned counsel was not able to completely finish his task of processing the various surrebuttal testimonies scheduled to be filed yesterday. Staff counsel chose to try to file as many of these Staff witnesses surrebuttal testimonies as possible. When it became clear that undersigned counsel might miss the Ordered deadline respecting one of the Staff's surrebuttal testimonies, he called counsel for Applicant Union Electric Company, d/b/a AmerenUE to advise him of the situation. The one witness whose testimony is being late filed is the surrebuttal testimony of Mr. Robert E. Schallenberg. This testimony has information that needed to be redacted and a number of multipage schedules so it was clear that this surrebuttal testimony would take the longest amount of time and effort to process. The undersigned counsel apologizes to the Commission and the parties for the inconvenience of this late filing.

WHEREFORE, the Staff requests leave to late-file the surrebuttal testimony and schedules of Robert E. Schallenberg.

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 28th day of February 2007.

/s/ Steven Dottheim