

**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 LATE-FILE LIST OF ISSUES,
ORDER OF WITNESSES AND ORDER OF CROSS-EXAMINATION.**

Comes now the Staff of the Missouri Public Service Commission (Staff), and files this Motion For Leave To Late File List of Issues, Order Of Witnesses And Order Of Cross-Examination. The Commission in its September 12, 2006 Order Adopting Procedural Schedule And Test Year directed that a List of Issues, Order Of Witnesses And Order Of Cross-Examination be filed on March 2, 2007. The parties to Case No. ER-2007-0002, including the Staff, worked diligently toward meeting that filing date, but obviously that deadline was not met. The Staff is filing this date the List Of Issues, Order Of Witnesses And Order Of Cross-Examination and requesting leave to make this late-filing. Undersigned Staff counsel apologizes for the inconvenience to the Commissioners and the Regulatory Law Judge that this delay has caused. The Staff is working diligently with the other parties with revenue requirement cases to complete and file a Reconciliation. The Staff hopes to complete and file a Reconciliation shortly.

WHEREFORE, the Staff requests leave to late-file the List of Issues, Order Of Witnesses And Order Of Cross-Examination.

Respectfully submitted,

/s/Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)

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 7th day of March 2007.

/s/ Steven Dottheim