

**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 STAFF RESPONSE

Comes now the Staff of the Missouri Public Service Commission (Staff), and files this Motion For Leave To Late File Staff Response. The Commission in its April 5, 2007 Order Directing Staff To Explain Portions Of The Tier I And Tier II Stipulations And Agreements directed the Staff to respond by no later than 5:00 p.m. on April 9, 2007. Although the Staff does not want to leave the impression that the Commission's questions were either voluminous or difficult to respond to, the demands of other Commission cases and the unavailability of certain Staff, until mid-afternoon April 9, 2007 due to commitments predating the Commission's issuance of its Order on April 5, 2007, complicated the Staff filing a response by no later than 5:00 p.m. on April 9, 2007. The Staff is late-filing its response and requesting leave to make this late-filing. Undersigned Staff counsel apologizes for the inconvenience.

WHEREFORE, the Staff requests leave to late-file the Staff Response To Commission Order Issued April 5, 2007.

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 10th day of April 2007.

/s/ Steven Dottheim