

**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 Gas Service)	Case No. GR-2007-0003
Provided to Customers in the Company's)	
Missouri Service Area.)	

**AMERENUE'S MOTION FOR ANY NECESSARY LEAVE
TO FILE ADDITIONAL TESTIMONY**

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company) and, pursuant to 4 CSR 240-2.130(8), hereby requests leave to file additional testimony submitted concurrently with the filing of this Motion. In this regard, AmerenUE states as follows:

1. Filed concurrently with the filing of this Motion are supplemental direct testimonies of four AmerenUE witnesses. These testimonies contain updated testimony to "update its Direct Case, i.e., its forecasted data for April to June 2006, to actual data, including limited Supplemental Direct Testimony." *Commission's Order Adopting Procedural Schedule*, September 12, 2006. While the Commission's above-referenced order authorizes the filing of this supplemental direct testimony, if and to the extent the Commission believes it is required, the Company requests leave to file this supplemental direct testimony pursuant to 4 CSR 240-2.130(8). Leave, if the Commission believes it is required, should be granted because granting leave is entirely consistent with the purpose of requiring the pre-filing of testimony in the first place. That is, as the Commission recognizes, to give parties "notice of the claims, contentions, and evidence in issue and to avoid unnecessary objections and delays caused by allegations of unfair surprise at the hearing." *See, e.g., In the Matter of Laclede Gas Company*, 202 Mo. PSC

LEXIS 1199, Case No. GT-2003-0032 (Aug. 29, 2002). Given that hearings are more than five and a half months away, supplementation serves those purposes.

WHEREFORE, if and to the extent the Commission believes it is required, the Company hereby requests leave to file the supplemental direct testimony submitted on this date in this docket by Gary S. Weiss, James R. Pozzo, Lee R. Nickloy, and C. Kenneth Vogl, and for such other and further relief the Commission deems proper under the circumstances.

Respectfully submitted,

Dated: September 29, 2006

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 29th day of September, 2006.

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