

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

SEP 21 2001

Missouri Public  
Service Commission

Staff of the Missouri Public Service Commission, )

Complaint, )

v. )

Case No. EC-2002-1

Union Electric Company, doing business as )

AmerenUE )

Respondent. )

**MOTION OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS  
FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Comes Now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch Companies, Inc.,  
The Boeing Company, Ford Motor Company, General Motors Corporation, Holnam, Inc.,  
Hussmann Refrigeration, ISP Minerals, Mallinckrodt, Inc., MEMC Electronic Materials,  
Monsanto Company, Precoat Metals, Procter & Gamble Manufacturing, Ralston Purina and  
Solutia, Inc., hereafter referred to as the Missouri Industrial Energy Consumers or MIEC, and  
file this motion for extension of time to file a responsive pleading. In support of its motion the  
MIEC states as follows:

1. The MIEC filed its application to intervene on July 5, 2001. An Order granting  
intervention was issued on August 10, 2001. This Order directed the MIEC to file a responsive  
pleading to Staff Complaint within 30 days of the issue date of the Order admitting or denying  
each factual ascertain or legal conclusion set forth in the Complaint.

2. Shortly after filing its application to intervene, the MIEC submitted data requests  
to the Commission Staff seeking data supporting the Staff's Complaint. The Staff stated it was  
unable to respond to the MIEC's data requests because no protective order had been issued.

3. On September 6, 2001 the Commission issued the protective order in this case.
4. The MIEC has not yet received responses to its data requests to the Staff, presumably because the Protective Order was only recently issued.
5. Because MIEC has obtained no data supporting the Complaint, the MIEC is not in a position to admit or deny each factual ascertain or legal conclusion in the Complaint.
6. In order to prepare a proper response to Staff Complaint, the MIEC request that the Commission grant an extension of time until 20 days after it receives Staff's data responses to file the responsive pleading directed by the Commission's August 10 Order.

WHEREFORE, the MIEC respectfully request that the Commission grant its Motion for Extension of Time to file a responsive pleading.

Recently submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed to all parties the 24th day of September 2001

*Diana M. Vuylsteke*