

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

Application of Union Electric Company     )  
d/b/a AmerenUE for Authorization to     )  
Manage its Nitrogen Oxide (NO<sub>x</sub>)     )  
Emission Allowance Inventory     )

**File No. EO-2010-0149**

**STAFF MOTION FOR ADDITIONAL TIME**

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”) and requests additional time to file its recommendation in this case. In support thereof, the Staff respectfully states as follows:

1. On November 19, 2009, Union Electric Company d/b/a AmerenUE (“AmerenUE” or “Company”) filed with the Commission an Application seeking an Order authorizing AmerenUE’s plan for the management, sale, exchange, transfer or other disposition of the Company’s nitrogen oxide emission allowances.

2. On December 14, 2009, the Commission issued an Order directing the Staff to file by January 11, 2010 its recommendation concerning the Application.

3. AmerenUE states at paragraph 9 in its Application as follows:

NO<sub>x</sub> Allowances are similar in many respects to SO<sub>2</sub> allowances in that both of them can be utilized to comply with emission limits (for NO<sub>x</sub> and SO<sub>2</sub>, respectively) applicable to the Company’s power plants. Consequently, it would be appropriate to track costs and revenues associated with NO<sub>x</sub> Allowances in the proposed ECRM, as is being proposed in the pending rate case for SO<sub>2</sub> allowances.

4. Upon the filing of the Company’s Application, the Staff determined that it would be productive for the parties to meet prior to the Staff filing its recommendation, in order for the parties to gain a more complete understanding of AmerenUE’s proposed nitrogen oxide emission

allowance management program. The Staff plans to coordinate meetings with both AmerenUE and the Office of the Public Counsel with AmerenUE's pending rate case (Case No. ER-2010-0036).

5. It is anticipated that the parties will be able to discuss this matter during the Technical/Settlement Conference in Case No. ER-2010-0036, scheduled for January 11 – 15, 2010. Following that meeting, the Staff will be better able to identify a date for filing its recommendation that reflects an efficient processing of the Company's Application. The Staff should be able to file a pleading indicating said date by January 19, 2010.

6. The other parties to this case, AmerenUE and the Public Counsel, have been contacted, and both support the Staff's request for additional time.

7. The Staff does not make this request to unduly delay these proceedings.

WHEREFORE, the Staff respectfully requests that the Commission grant the Staff additional time, until January 19, 2010, to file a pleading indicating when it will be able to file its recommendation in this proceeding.

Respectfully submitted,

/s/ Sarah Kliethermes

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11th day of January 2010.

/s/ Sarah Kliethermes