

**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)	<u>Case No. ER-2010-0036</u>
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

MOTION TO ESTABLISH RESPONSE DATE

COMES NOW the Office of the Public Counsel and for its Motion to Establish Response Date states as follows:

1. On July 24, 2009, Union Electric Company d/b/a AmerenUE filed a general rate case along with a request for an early, interim rate increase. In this motion, Public Counsel asks the Commission to establish a time for responses to the request for an early rate increase.

2. In its Order Directing Notice, Suspending Tariff, Setting Hearings, And Directing Filings issued on July 27, the Commission established August 17 as the deadline for applications to intervene. In order to allow intervenors the opportunity to respond to AmerenUE's request for an interim rate increase, the Commission should set a response date after it has ruled on applications for intervention. In its July 27 order, the Commission established August 27 as the date for intervenors to file recommendations on test year and true-up. Public Counsel suggests that the same date would be appropriate for all parties to respond to AmerenUE's request for an interim rate increase.

3. In addition to the consideration of intervenors, the nature of the request itself requires a longer than normal response time. While Commission rule 4 CSR 240-2.080(15) provides that parties are generally allowed ten days to respond to pleadings, the rule recognizes

that the Commission can expand that time in appropriate circumstances. The request for an interim rate increase presents a more complicated and weighty issue than most pleadings, and so the Commission should allow a longer time than ten days to respond.

WHEREFORE, Public Counsel respectfully requests that the Commission establish August 27, 2009 as the due date for responses to AmerenUE's request for an interim rate increase.

Respectfully submitted,

OFFICE OF THE Public Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed to parties of record this 30th day of July 2009.

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