

In the Matter of the Tariff Filings of Union)
Electric Company d/b/a Ameren Missouri, to) Case No. ER-2012-0166
Increase Its Revenues for Retail Electric Service.)

4. As is the case for the Staff, the Company too is fully engaged in preparing Surrebuttal Testimony for filing in this docket on September 7, 2012, and is also engaged in discovery in this case (including discovery it is directing to other parties and depositions, and responding to substantial discovery requests from other parties). The Company (including employees and attorneys with substantial rate case responsibilities) is also engaged in a

number of other proceedings before the Commission (both formal cases, workshops, and potential rulemakings). The Testimony Order contemplates specific additional evidence on a number of matters which require careful analyses and consideration, including the input of a number of personnel who, as noted, must also address many pre-existing rate case issues. Properly responding to the Testimony Order and preparing and filing testimony in compliance therewith within the original deadline poses significant challenges for the Company as well.

5. In view of the foregoing, the Company has no objection to the Staff's request for an additional week to file additional testimony in response to the Testimony Order so long as the same extension of time is afforded the Company (and, as a matter of fairness, the Company would suggest that the same extension of time should be afforded to other rate case parties as well). As noted, the Company's circumstances and demands are similar to the Staff's. Moreover, all parties should have an equal amount of time to provide such testimony, and an equal amount of time thereafter to prepare to offer responsive testimony at the evidentiary hearings, as contemplated by the Testimony Order.

WHEREFORE, Ameren Missouri prays that the Commission make and enter its order granting Ameren Missouri (and any other party desiring to file additional testimony in response to the Testimony Order) one additional week, to September 14, 2012, within which to file additional testimony as ordered by the Testimony Order, and for such other and further relief as is just under the circumstances.

Dated: August 29, 2012

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503

SMITH LEWIS, LLP

P.O. Box 918

Columbia, MO 65205-0918

(T) 573-443-3141

(F) 573-442-6686

lowery@smithlewis.com

Thomas M. Byrne, Mo. Bar #33340

Wendy K. Tatro, Mo. Bar # 60261

Union Electric Company

d/b/a Ameren Missouri

P.O. Box 66149 (MC 1310)

1901 Chouteau Avenue

St. Louis, MO 63166-6149

(T) 314-554-2514

(F) 314-554-4014

AmerenMoService@ameren.com

Attorneys for Union Electric Company

d/b/a Ameren Missouri

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 29th day of August, 2012.

/s/James B. Lowery
James B. Lowery