

**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	)	<b>Case No. ER-2007-0002</b>
Rates for Electric Service Provided to Customers	)	
in the Company's Missouri Service Area.	)	

**PUBLIC COUNSEL'S MOTION TO LATE FILE POST-HEARING BRIEF**

COMES NOW The Office of the Public Counsel and for its Motion to Late File Post-hearing Brief states as follows:

1. On March 30, 2007, the Commission issued a notice establishing April 20, 2007 as the deadline for filing post-hearing briefs.
2. Public Counsel filed its brief electronically on the following day, April 21, 2007. The late filing was due to the involvement of the undersigned in other Commission matters, including but not limited to evidentiary hearings and post-hearing settlement discussions in Case No. ER-2007-0002, the Aquila rate case.
3. Because the testimony was filed only a day after the deadline, neither any party nor the Commission will be harmed by its late filing.
4. The Commission will not be harmed because there are still approximately six weeks before the operation of law date. Although that is a relatively short time for the Commission to deliberate and issue its Report and Order, receiving one of the briefs one day late should not cause harm under that schedule.
5. The parties will not be harmed because reply briefs are not contemplated in the schedule, and so parties will be reading the briefs for purposes of post-decision motions rather than reply briefs.

WHEREFORE Public Counsel respectfully requests that the Commission grant this Motion to Late File Post-hearing Brief and accept the filing of the Post-hearing Brief of Public Counsel.

Respectfully submitted,

OFFICE OF THE Public Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all parties this 23rd day of April, 2007.

By: \_\_\_\_\_