

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

In the Matter of the Consideration of Adoption)
of the PURPA **Section 111(d)(16)** Integrated)
Resource Planning Standard as Required by) **File No. EW-2009-0290**
Section 532 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA **Section 111(d)(17)** Rate Design)
Modifications to Promote Energy Efficiency) **File No. EW-2009-0291**
Investments Standard as Required by Section)
532 of the Energy Independence and Security)
Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA **Section 111(d)(18)** Consideration)
of Smart Grid Investments Standard and PURPA) **File No. EW-2009-0292**
Section 111(d)(19) Smart Grid Information)
Standard as Required by Section 1307 of the)
Energy Independence and Security Act of 2007.)

**STAFF’S REQUEST FOR ADDITIONAL TIME TO RESPOND TO FILINGS OF
UNION ELECTRIC COMPANY d/b/a AMERENUE AND MISSOURI
DEPARTMENT OF NATURAL RESOURCES**

Comes now the Staff of the Missouri Public Service Commission (“Staff”) through the Office of the Staff Counsel of the Missouri Public Service Commission (“Commission”) and requests additional time to Friday, November 13, 2009 to respond to (a) the Union Electric Company d/b/a AmerenUE’s Reply To The Staff’s September 22, 2009 Response and (b) the Response Of The Missouri Department Of Natural Resources To Staff’s Response To Order Setting Date For Filing Procedural Schedules And Request For Leave To Late-File, both filed on October 26, 2009. In support thereof, the Staff states as follows:

1. Commission Rule 4 CSR 240-2.080(15) provides: “Parties shall be allowed not more than ten (10) days from the date of filing in which to respond to any pleading unless

otherwise ordered by the commission.” Ten (10) days from October 26, 2009 is November 5, 2009.

2. Due to other Commission proceedings and matters requiring the attention of the Staff assigned to these consolidated cases and certain items raised in the October 26, 2009 filings of Union Electric Company d/b/a AmerenUE (AmerenUE) and Missouri Department Of Natural Resources (MDNR) requiring consideration by the Staff, the Staff is requesting an additional eight (8) days until Friday, November 13, 2009 to file a response.

3. Counsel for the Staff has contacted Counsel for AmerenUE who has indicated AmerenUE does not oppose Staff’s request for additional time to respond. Counsel for the Staff has not been successful in his efforts to speak with Counsel for MDNR.

4. The Staff does not seek additional time so as to delay these proceedings or to inconvenience the Commission or the participants.

Wherefore the Staff requests additional time to Friday, November 13, 2009 to respond to the October 26, 2009 filings of AmerenUE and MDNR in these consolidated proceedings.

Respectfully submitted,

/s/ Steven Dottheim
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record and individuals and entities on the Staff's electronic mail list of interested individuals and entities this 5th day of November 2009.

/s/ Steven Dottheim