

**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	)	Case No. ER-2007-0002
Service Provided to Customers in the	)	
Company's Missouri Service Area.	)	

**MOTION FOR LEAVE TO LATE-FILE JOINT RESPONSE**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and the undersigned Staff counsel requests leave to late-file the Joint Response Of Staff And AmerenUE To Order Directing Filing. In support thereof, the undersigned Staff counsel states as follows:

1. On August 30, 2006 the Commission issued an Order Directing Filing ordering any party taking a position on the appropriate test year to be used in this case shall file, on or before September 7, 2006, a statement regarding its test year position.

2. Due to a rulemaking hearing and other Commission matters occurring on September 7, 2006, the undersigned Staff counsel was unable to timely file the Joint Response Of Staff And AmerenUE To Order Directing Filing.

3. The undersigned Staff counsel apologizes for any inconvenience that this delay in filing the Joint Response Of Staff And AmerenUE To Order Directing Filing has caused.

Wherefore the undersigned Staff counsel requests leave to late-file the Joint Response Of Staff And AmerenUE To Order Directing Filing.

Respectfully submitted,

**/s/Steven Dottheim**

Steven Dottheim

Chief Deputy General Counsel

Missouri Bar No. 29149

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Missouri Public Service Commission

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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 this 8th day of September 2006.

/s/ Steven Dottheim