

May 23, 2002

VIA FEDERAL EXPRESS



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65101

Re: MPSC Case No. EC-2002-1

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its Explanation of Classification of Information in Union Electric Company's Rebuttal Testimony.

Very truly yours,

A handwritten signature in black ink, appearing to read "James J. Cook", is written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/vww

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

The Staff of the Missouri Public)
Service Commission,)

Complainant,)

v.)

Case No. EC-2002-1

Union Electric Company, d/b/a)
AmerenUE,)

Respondent.)

**EXPLANATION OF CLASSIFICATION OF INFORMATION
IN UNION ELECTRIC COMPANY'S REBUTTAL TESTIMONY**

COMES NOW Union Electric Company, d/b/a AmerenUE ("Company"), and submits its Explanation of Classification of Information in Union Electric Company's Rebuttal Testimony pursuant to Section I of the Protective Order issued September 5, 2001.

1. On May 10, 2002, the Company submitted for filing the testimony of various witnesses. Several of those witnesses' testimony contained Highly Confidential or Proprietary information, as those terms are used in the Protective Order previously issued in this case. See Order Establishing Protective Order, issued September 5, 2001.

2. Portions of Pages 34 through 38 of Warner L. Baxter's Rebuttal Testimony and Schedules 3-1 and 3-2 were marked "Proprietary" because they contain "confidential or private technical, financial and business information". The information included in these pages concerns the impact of the Staff's proposal on the Company's investors and financing costs. It includes Company analysis of the effect of that proposal on the Company's finances, its financing costs and its investors. As such, disclosure could adversely affect those matters, perhaps to the detriment of the Company, its shareholders and its customers.

3. Schedules 6 and 7 attached to Garry L. Randolph's Rebuttal Testimony were marked "Proprietary" because they contain "confidential or private technical, financial and business information". These Schedules list specific planned generation plant upgrades, the dates of those planned actions, and the anticipated costs thereof. The disclosure of the information could significantly adversely affect the Company's ability to obtain the lowest possible cost for these activities. Disclosure would put the Company at a distinct disadvantage in bidding various projects and in obtaining necessary financing.

4. Portions of Pages 20 through 23 of Craig D. Nelson's Rebuttal Testimony and Schedule 3 were marked "Highly Confidential" because they contain "market specific information" about the Company's resource planning needs and its ability to sell power in the marketplace. If this information were disclosed to the public it would compromise the Company's ability to buy or sell electricity at reasonable prices, and therefore would be harmful to Missouri retail customers.

5. Portions of Pages 32 through 34, 37, 38, 41, 42, 45, 46, 49 of Richard A. Voytas' Rebuttal Testimony and Schedules 5, 6, 8 and 10 were marked "Highly Confidential" because they contain "market-specific information" relating to services offered in competition with others. If this information were disclosed to the public it would compromise the Company's ability to buy or sell electricity at reasonable prices, and therefore would be harmful to Missouri retail customers.

6. Pages 10 and 11 of David Cross' Rebuttal Testimony were marked "Proprietary" because they contain "confidential or private technical, financial and business information". The information included on these pages describe the details of the various incentive compensation plans for different levels of Ameren employees. Disclosure of specific levels of incentive

compensation would put the Company at a competitive disadvantage in competing for talent in the marketplace.

WHEREFORE, as required by the terms of the Protective Order cited above, the Company hereby submits its Explanation of the Classification of Information included in the Company's Rebuttal Testimony.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By:



James J. Cook, MBE #22697
Managing Associate General Counsel

Steven R. Sullivan, MBE #33102
Vice President, General Counsel
& Secretary

One Ameren Plaza
1901 Chouteau Avenue
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
jjcook@ameren.com
314-554-2237
srsullivan@ameren.com
314-554-2098
314-554-4014 (fax)

OF COUNSEL:

Robert J. Cynkar
Victor J. Wolski
Gordon D. Todd
Cooper & Kirk, PLLC
1500 K Street, N.W.
Suite 200
Washington, D.C. 20005
202-220-9600
202-220-9601 (fax)

DATED: May 23, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via Federal Express or U.S. Mail on this 23rd day of May, 2002, on the following parties of record:

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65 101

John B. Coffman
Deputy Public Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Steve Dottheim
Chief Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Robert C. Johnson, Esq.
Lisa C. Langeneckert, Esq.
Law Office of Robert C. Johnson
720 Olive Street, Suite 2400
St. Louis, MO 63101

Dennis Frey
Assistant General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Diana M. Vuylsteke
Bryan Cave LLP
One Metropolitan Square
211 North Broadway, Ste. 3600
St. Louis, MO 63102-2750

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65 101

Robin E. Fulton
Schnapp, Fulton, Fall, Silver &
Reid, L.L.C.
135 East Main Street
P.O. Box 151
Fredericktown, MO 63645

R. Larry Sherwin
Assistant Vice President
Regulatory Administration
Laclede Gas Company
720 Olive Street, Room 1415
St. Louis, MO 63 101

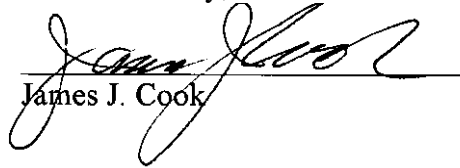
Michael C. Pendergast
Assistant Vice President &
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63 101

Ronald Molteni
Assistant Attorney General
Supreme Court Building
221 West High Street
P.O. Box 899
Jefferson City, MO 65102

Tim Rush
Kansas City Power & Light Company
1201 Walnut
Kansas City, MO 64141

James M. Fischer
Fischer & Dority, P.C.
101 Madison, Suite 400
Jefferson City, MO 65101

Samuel E. Overfelt, Esq.
Law Office of Samuel E. Overfelt
618 East Capitol Avenue
P.O. Box 1336
Jefferson City, MO 65102



James J. Cook