

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

OCT 6 2000

Missouri Public  
Service Commission

In the matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for )  
an order to authorizing the sale, transfer )  
and assignment of certain Assets, Real )  
Estate Leased Property, Easements and )  
Contractual Agreements to Central Illinois )  
Public Service Company (d/b/a AmerenCIPS) )  
and, in connection therewith, certain other )  
related transactions. )

Case No. Em-2001-233

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), a Missouri corporation, and hereby requests that the Commission issue a standard Protective Order for "highly confidential" and "proprietary" information as defined by the Commission. In support of its motion, AmerenUE states as follows:

1. Concurrently herewith, AmerenUE is filing its Application for Transfer of Assets, Change in Decommissioning Trust Fund, and Motion for Expedited Treatment ("Application") with the Commission along with the Direct Testimony and supporting schedules of Craig D. Nelson and Kevin L. Redhage.

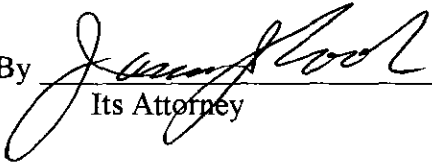
2. Schedule 4 to Mr. Nelson's Direct Testimony contains information that AmerenUE contends is covered by the definition of "highly confidential" and "proprietary" found in the Commission's standard Protective Order. In particular, the information contained in Schedule 4 represents market-specific information and confidential financial and business information. As such, AmerenUE contends such items should be disclosed only to Staff and not to the general public.

3. None of the information contained in Schedule 4 can be found in any format in any other public document.

WHEREFORE, for the foregoing reasons, Union Electric Company respectfully requests that the Commission issue an Order establishing a standard Protective Order in this case for "highly confidential" and "proprietary" information.

Respectfully submitted,

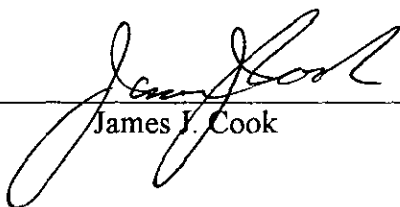
UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By   
Its Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first-class, U.S. mail, postage prepaid, to the following parties on this 5<sup>th</sup> day of October, 2000.

  
James J. Cook