

**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-
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

**MOTION TO OPEN CASE, TO ESTABLISH PROTECTIVE ORDER
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE” or (“Company”), pursuant to 4 CSR 240-2.085(1) and 4 CSR 240-2.080(16), and hereby requests the Commission to open a case and to issue the standard version of its Protective Order for “Highly Confidential” and “Proprietary” information as defined by the Commission that allows use of the Microsoft Office Word 2003 Redaction Add-In Software. AmerenUE also requests that the Commission give these Motions expedited treatment. In support of its Motions, AmerenUE states as follows:

1. AmerenUE presently expects to file a general rate increase request proceeding by filing rate schedules and the minimum filing requirements prescribed by 4 CSR 240-3.030 on July 7, 2006. AmerenUE requests that the Commission open a case at this time to create a docket and case number for use in making the upcoming general rate increase request filing.¹
2. AmerenUE's filing will include testimony, some of which will contain proprietary or highly confidential information. Consequently, in order for AmerenUE to comply with 4 CSR 240-2.085(2), which reads in pertinent part as follows: “Pleadings, testimony, or briefs shall not

¹ As provided for in Section 393.150, RSMo., opening a case will not invoke the potential suspension periods typically imposed by the Commission because those suspension periods are triggered by the filing by a utility of “schedules stating a new rate or charge” Consequently, to the extent the Commission orders suspension, the “11-month clock” commonly referred to and arising under Section 393.150, RSMo. would not begin to run until the rate schedules are filed, which as noted above is presently expected to occur on July 7, 2006.

contain highly confidential or proprietary information unless a protective order has been issued ...”, AmerenUE is requesting that the Commission establish a protective order in advance of its actual rate increase request filing so that the Company can file its testimony that will contain highly confidential or proprietary information. A protective order is also sought to facilitate further discovery that may occur during the pendency of this case which the Company expects will include additional requests for highly confidential or proprietary information. Additional testimony by other parties and the Company may also contain highly confidential or proprietary information for which a protective order will be required.

3. The Company and its customers would be harmed absent the entry of a protective order because the upcoming general rate increase request case, which will examine a wide spectrum of matters relating to the Company’s business, will involve sensitive financial and business information including information relating to the Company’s underlying cost structure, resource planning, energy position, capacity position and other information, the public release of which would damage the Company and its customers. Release of such information that cannot be found in any format in any other public document would have significant adverse effects on AmerenUE’s operations and may conflict with or may be in violation of SEC laws and regulations. Competitors could gain access to information that, in competitors’ hands, would be harmful to AmerenUE, and AmerenUE could lose business opportunities or other strategic advantages which depend upon the confidentiality of such information. Such business losses would ultimately harm AmerenUE’s customers by reducing its revenues or increasing its costs. Such information also cannot be found in any format in any other public document.

4. In order to allow the filing of highly confidential or proprietary information as expected on July 7, 2006, AmerenUE respectfully requests that this Motion for Protective Order

be granted on an expedited basis prior to July 7, 2006. The harm that will be avoided by issuing the protective order by the date requested is addressed in paragraph 3 above.

WHEREFORE, AmerenUE respectfully requests that the Commission issue the version of its standard Protective Order that allows use of the Microsoft Office Word 2003 Redaction Add-In Software prior to July 7, 2006.

Dated: July 2, 2006

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 2nd day of July, 2006.

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