

Bob Holden

Governor

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July 2, 2002

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Staff v. AmerenUE,

Case No. EC-2002-1

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 8 copies of Public Counsel's Request to Shorten Time to Respond to Data Requests 4063 Through 4065 and Request for Expedited Treatment. Please "file stamp" the extra-enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

Douglas E. Micheel Senior Public Counsel

DEM:kh

cc: Counsel of record

Enclosure

# 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.	)	

# PUBLIC COUNSEL'S REQUEST TO SHORTEN TIME TO RESPOND TO DATA REQUESTS 4063 THROUGH 4065 AND REQUEST FOR EXPEDITED TREATMENT

COMES NOW the Office of the Public Counsel and pursuant to 4 CSR 240-2.090(2) requests that Union Electric's time to respond to Public Counsel data requests 4063, 4064 and 4065 be shortened from twenty days (20) to ten (10) days in support Public Counsel states as follows:

- 1. On June 24, 2002, Union Electric Company ("UE") filed its cross-surrebuttal testimony in this proceeding. Specifically, UE filed the cross-surrebuttal of witness Weiss that in part responded to Public Counsel witness Effron.
- 2. The Weiss testimony raises issues with respect to data requests and information about transmission charges billed from Ameren Energy to Union Electric Company not previously raised by UE.

3. On July 2, 2002, Public Counsel faxed to UE data requests 4063 through 4065 seeking information regarding the claims made in witness Weiss's cross-surrebuttal testimony. (A copy of the data requests are attached.).

4. Because of the pendency of the hearing, Public Counsel requests that UE be directed to respond to Public Counsel data requests 4063 through 4065 no later than 10 days from July 2, 2002. Thus by July 12, 2002.

Public Counsel witness Effron is scheduled to testify on July 18, 2002.
 (Proposed List of Issues Order of Witnesses and Order of Cross-Examination, p. 14, filed
 June 28, 2002).

6. Due to the pendency of the hearing good cause exists to expedite the answers to data requests 4063 through 4065.

7. Public Counsel requests the Commission order UE to respond to this request within five days.

WHEREFORE: Public Counsel requests the Commission shorten UE's time to respond to Public Counsel's data requests 4063 through 4065 from 20 days to 10 days.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:

Douglas E. Micheel

Senior Public Counsel

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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 2nd day of July 2002:

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#### SAMUEL E OVERFELT

Law Office of Samuel E Overfelt PO Box 1336 Jefferson City MO 65102

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## PUBLIC COUNSEL DATA REQUEST

# UNION ELECTRIC COMPANY d/b/a AMERENUE

#### **CASE NO EC-2002-1**

·	
REQUESTED FROM:	Mary Hoyt
DATE REQUESTED:	July 2, 2002
INFORMATION REQUEST	ED:
	rebuttal, page 8, lines 1-2, please provide copies of the referenced er data requests" related to outside services expenses.
REQUESTED BY:	David Effron
INFORMATION PROVIDE	ED:
	•
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request is accurate and compupon present facts known to Office of the Public Counsel	the Office of the Public Counsel in response to the above information lete, and contains no material misrepresentations or omissions based the undersigned. The undersigned agrees to immediately inform the if any matters are discovered which would materially affect the the information provided in response to the above information.
DATE RECEIVED:	SIGNED BY:
	TITLE:

### PUBLIC COUNSEL DATA REQUEST

#### UNION ELECTRIC COMPANY d/b/a AMERENUE

#### **CASE NO EC-2002-1**

REQUESTED FROM:	Mary Hoyt	•
DATE REQUESTED:	July 2, 2002	•
INFORMATION REQUEST	ED:	
	rebuttal, page 8, lines 5-9, please provide the trace Union Electric Company and the "comparable years 2000 and 2001.	
REQUESTED BY:	David Effron	
INFORMATION PROVIDE	ED:	
		1
request is accurate and compl upon present facts known to t Office of the Public Counsel	the Office of the Public Counsel in response to lete, and contains no material misrepresentation the undersigned. The undersigned agrees to imit any matters are discovered which would mate the information provided in response to the about	s or omissions based mediately inform the erially affect the
DATE RECEIVED:	SIGNED BY:	·
	TITLE:	· ·

### PUBLIC COUNSEL DATA REQUEST

# UNION ELECTRIC COMPANY d/b/a AMERENUE

#### **CASE NO EC-2002-1**

REQUESTED FROM:	Mary Hoyt	
DATE REQUESTED:	July 2, 2002	1
INFORMATION REQUEST:	ED:	1
billed from Ameren Energy to	rebuttal, page 8, lines 5-9, please provide the transmission char to Union Electric Company and the "comparable amount record first six months of 2001 and the last six months of 2001.	rges led as
REQUESTED BY:	David Effron	1
INFORMATION PROVIDE		
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		1
request is accurate and complete upon present facts known to the Office of the Public Counsel is accuracy or completeness of the	he Office of the Public Counsel in response to the above informate, and contains no material misrepresentations or omissions the undersigned. The undersigned agrees to immediately information matters are discovered which would materially affect the he information provided in response to the above information.	based m the
DATE RECEIVED:	SIGNED BY:	
	TITLE:	·