

December 19, 2001

VIA HAND-DELIVERY



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

FILED³

DEC 20 2001

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter are its:

- **REQUEST FOR LEAVE TO LATE FILE OBJECTION; AND**
- **OBJECTION TO STAFF'S PROPOSED BIFURCATED SCHEDULE**

Kindly acknowledge receipt of these filings by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

James J. Cook / sh

James J. Cook
Managing Associate General Counsel

JJC/mlh
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
DEC 20 2001

Missouri Public
Service Commission

The Staff of the Missouri Public
Service Commission,

Complainant,

v.

Union Electric Company, d/b/a
AmerenUE,

Respondent.

Case No. EC-2002-1

UNION ELECTRIC COMPANY'S REQUEST FOR LEAVE
TO LATE FILE OBJECTION

COMES NOW Union Electric Company ("AmerenUE" or "Company") and for its Request for Leave to Late File its Objection To Staff's Proposed Bifurcated Schedule, states as follows:

1. Parties to this proceeding were given until 4:00 p.m. yesterday, December 19th to file responses pursuant to Correction Order: Nunc Pro Tunc Order Directing Filing and Modifying Filing Dates, issued December 17, 2001.
2. In that Order, "all parties" were directed to file "a response to the procedural schedule in Staff's Motion for Reconsideration ..."
3. At 3:58 p.m., Union Electric Company received by e-mail a copy of a filing made by the Staff which included a *new* proposed procedural schedule. The Company and other parties had no time whatsoever to respond to the *new* proposed procedural schedule prior to the 4:00 p.m. deadline.
4. The Company hereby requests leave to file its Objection to Staff's Bifurcated Proposed Procedural Schedule after the 4:00 p.m. December 19th deadline. That objection

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requests that the Commission either grant the parties time to respond to the Staff's new proposal or that it be rejected .

5. WHEREFORE, for the reasons stated above, the Company requests leave to late file its Objection to Staff's Bifurcated Proposed Procedural Schedule.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: James J. Cook / sh
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Managing Associate General Counsel

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

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DATED: December 20, 2001

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail or fax, on this 20th day of December, 2001, on the following parties of record:

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James J. Cook / sh
James J. Cook

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

The Staff of the Missouri Public
Service Commission,

Complainant,

v.

Union Electric Company, d/b/a
AmerenUE,

Respondent.

Case No. EC-2002-1

**UNION ELECTRIC COMPANY'S OBJECTION TO
STAFF'S PROPOSED BIFURCATED SCHEDULE**

COMES NOW Union Electric Company ("AmerenUE" or "Company") and for its
Objection to Staff's Proposed Bifurcated Schedule, states as follows:

1. At 3:58 p.m. on this day, the Company received via e-mail a copy of the Staff's
Response to Union Electric Company's Reply to Staff's Motion for Reconsideration.

2. In that pleading, Staff proposes an entirely new schedule for this case, including
the bifurcation of the entire case into two separate proceedings. It is totally inappropriate to
bifurcate this proceeding as suggested by Staff. However, the filing of this proposal within the
last hour allowed deprives the Company and other parties the ability to appropriately respond.

3. Therefore, the Company requests that the Commission either reject Staff's
proposal outright or allow the Company and other parties a reasonable time to respond to this
unprecedented proposal.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: James J. Cook / sh
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