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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 2 0 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

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Managing Associate General Counsel

JJC/mlh Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



The Staff of the Missouri Public Service Commission,) Service Commission
Complainant,	
v.) Case No. EC-2002-1
Union Electric Company, d/b/a AmerenUE,)))
Respondent.)

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:

- 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



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

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

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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: 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:

General Counsel Missouri Public Service Commission 200 Madison Street, Suite 100 Governor Office Building Jefferson City, MO 65101

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

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James J. Cook / sh

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Staff of the Missouri Public)	
Service Commission,	j j	
	j j	
Complainant,)	
-)	
v.)	Case No. EC-2002-1
)	
Union Electric Company, d/b/a)	
AmerenUE,)	
)	
Respondent.)	

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, MBE #22697
Managing Associate General Counsel

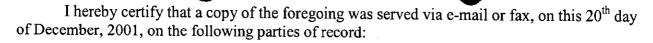
Steven R. Sullivan, MBE #33102 Vice President, General Counsel & Secretary

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DATED: December 20, 2001

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