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November 1, 2001

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

**RE: Case No. EC-2002-1 – Staff of the Missouri Public Service Commission,
Complainant, vs. Union Electric Company, d/b/a/ AmerenUE, Respondent.**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S MOTION FOR LEAVE TO CORRECT THE PRE-FILED DIRECT TESTIMONY OF STAFF WITNESS RONALD L. BIBLE.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams
Associate General Counsel
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Enclosure
cc: Counsel of Record

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

Staff of the Missouri Public Service)
Commission)
)
Complainant,)
)
v.)
)
Union Electric Company, d/b/a)
AmerenUE,)
)
Respondent.)

Case No. EC-2002-1

**STAFF'S MOTION FOR LEAVE TO CORRECT THE PRE-FILED
DIRECT TESTIMONY OF STAFF WITNESS RONALD L. BIBLE**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion for Leave to Correct the Pre-filed Direct Testimony of Staff Witness Ronald L. Bible, states as follows:

1. Staff witness Ronald L. Bible has discovered errors in the inputs for long-term debt and preferred stock that he used in calculations he relied on for numbers that appear in his direct testimony. Due to these erroneous inputs, numbers appearing at several pages and on several schedules of his pre-filed testimony are incorrect.

2. In addition, the direct testimony as filed includes non-substantive items that need to be corrected, including the inclusion of an extraneous table on Schedule 29.

3. Having identified the need to make these corrections to Mr. Bible's direct testimony and schedules the Staff thought it best to make these corrections at this time. The Staff points out that these corrections result in a change in the weighted cost of capital range recommended by Mr. Bible from 8.14 to 8.72 percent filed on July 2, 2001 to 8.13 to 8.70 percent filed this date.

4. The pages of the direct testimony of Staff witness Ronald L. Bible where he would make corrections are denoted as follows: Pages 2, 13, 16, 18, 21, 22, 23, 28, 30 and 31; Schedules. 1-1, 9, 10, 11, 12, 17, 18, 23, 25 and 29.

5. Attached hereto are pages to the direct testimony of Staff witness Ronald L. Bible that show, in red text or red strikethrough, the corrections to the direct testimony of Staff witness Ronald L. Bible that he would make. Also accompanying this pleading are an original and eight conformed copies of the direct testimony and schedules of Ronald L. Bible, containing the corrections without red text or red strikethrough. In the original and copies of the complete direct testimony and schedules being filed today, the date "11/01/2001," appears on the bottom left-hand corner of the cover sheet and on the bottom left-hand corner of each page where a correction has been made; this is the testimony that the Staff anticipates offering into evidence as an exhibit at the evidentiary hearing.

WHEREFORE, the Staff requests the Commission for leave to make this filing of corrections to the direct testimony of Staff witness Ronald L. Bible that was filed with the Staff's complaint on July 2, 2001.

Respectfully submitted,

DANA K. JOYCE
General Counsel

A handwritten signature in black ink, appearing to read "Nathan Williams", is written over a horizontal line.

Nathan Williams
Associate General Counsel
Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of November, 2001.

Nathan Williams

Service List for
Case No. EC-2002-1
Verified: October 30, 2001 (rr)

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