## LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101 FAX: (314) 588-0638

Robert C. Johnson

DIRECT: (314) 345-6436

E-MAIL: bjohnson@bspmlaw.com

Lisa C. Langeneckert

DIRECT: (314) 345-6441

E-MAIL: llangeneckert@bspmlaw.com

December 18, 2001

FILED

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<u>VIA OVERNIGHT MAIL</u>

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65101 Missouri Public Service Commission

Re: Staff Complaint of Union Electric Rates, Case No. EC-2002-1

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Motion in Support of Staff's Proposed Procedural Schedule Filed December 11, 2001. An additional copy of this document is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,

Lisa C. Langeneckert

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Enclosures (11)

cc/enc: All parties of record



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

DEC	1	9	2001	

Staff of the Missouri Public Service Commission	Missouri Public S <b>ervice Commissi</b> on
Complainant,	
v.	Case No.: EC-2002-1
Union Electric Company, d/b/a AmerenUE,	
Respondent.	) )

## MISSOURI ENERGY GROUP'S MOTION IN SUPPORT OF STAFF'S PROPOSED PROCEDURAL SCHEDULE FILED DECEMBER 11, 2001

COMES NOW the Missouri Energy Group ("MEG"), and for its Motion in Support of Staff's Procedural Schedule states as follows:

- 1. On December 7, 2001, the Public Service Commission ("Commission") issued its Order establishing adoption of a July 30, 2001 test year and setting a procedural schedule ("Order").
- On December 11, 2001, the Staff of the Missouri Public Service
   Commission ("Staff") filed a Motion for Reconsideration of said Order along with a proposed procedural schedule using the July 30, 2001 test year ordered by the
   Commission.
- On December 17, 2001 the Commission issued its Order requiring all
  parties to file a pleading in opposition to or support of the Staff's proposed procedural
  schedule.
- 4. The MEG supports the Staff's proposed procedural schedule under the scenario of a July 30, 2001 test year, with the understanding that AmerenUE is willing to

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make any rate refund that results from this case retroactive to April 1, 2002. As stated in its Motion for Reconsideration dated December 14, 2001, the MEG is reluctant to have the over-earnings by AmerenUE continue any longer, but also realizes that the Staff has to refile its case, given the change in test year. No one knows better than the Staff how long it will take for this refiling to be compiled, and the MEG is unable to file meaningful testimony without first having the opportunity to review Staff's filing with a later test year and AmerenUE's rebuttal thereto.

WHEREFORE, the MEG supports the procedural schedule submitted by Staff in its December 11, 2001 Motion for Reconsideration with the above-stated proviso.

Respectfully Submitted,

Robert C. Johnson (MBE #15755)

(314) 345-6436

bjohnson@blackwellsanders.com

Lisa C. Langeneckert (MBE #49781)

(314) 345-6441

llangeneckert@blackwellsanders.com

720 Olive Street, 24<sup>th</sup> Floor

St. Louis, MO 63101-2313

(314) 588-0638 (fax)

Attorneys for Missouri Energy Group

## CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EC-2002-1

Dated at St. Louis, Missouri this 18th day of December, 2001:

John B. Coffman, Esq. Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

James J. Cook, Esq. Ameren Services Company 1901 Chouteau Avenue P.O. Box 66149 (M/C 1310) St. Louis, MO 63166-6149

Steven Dottheim, Esq. Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

James M. Fischer, Esq. Fischer & Dority, P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101

Robin Fulton, Esq. 135 East Main Street P.O. Box 151 Fredericktown, MO 63645 Ronald Molteni Assistant Attorney General 221 West High Street, P.O. Box 899 Jefferson City, MO 65102

Samuel E. Overfelt, Esq. 618 East Capitol Ave., P.O. Box 1336 Jefferson City, MO 65102

Michael C. Pendergast, Eq. Laclede Gas Company 720 Olive Street, Room 1520 St. Louis, MO 63101

Tim Rush, Esq. Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64141

Diana M. Vuylsteke, Esq. Bryan Cave, LLP 211 North Broadway, Suite 3600 St. Louis, MO 63102-2750

Lisa C. Langeneckert