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May 16, 2002

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

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Request for Additional Time to Provide Information Pursuant to Protective Order.**

Very truly yours,

James J. Cook /sh

James J. Cook
Managing Associate General Counsel

JJC/vww

Enclosures

15965

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.	)	

REQUEST FOR ADDITIONAL TIME
TO PROVIDE INFORMATION
PURSUANT TO PROTECTIVE ORDER

COMES NOW Union Electric Company ("AmerenUE" or "Company"), pursuant to 4 CSR 240-2.080, and requests that its "Request for Additional Time to Provide Information Pursuant to Protective Order" be granted. In explanation of this request, the Company states as follows:

1. On May 10, 2002, the Company submitted for filing the testimony of various witnesses. Several of those witnesses' testimony contained Highly Confidential or Proprietary information, as those terms are used in the Protective Order previously issued in this case. See Order Establishing Protective Order, issued September 5, 2001.

2. Section I of that Order indicates that "[w]ithin five days of the filing of designated testimony, the party asserting the claim shall file with the Commission the specific ground or grounds for each claim." Further, this section states that the filing shall also "show the nature of the information sought to be protected and specifically state the alleged harm of disclosure."

3. The Company hereby requests an additional eight days to make this filing. In support of that request, the Company states that the press of finalizing the significant amount of testimony which was filed on May 10, 2002, followed immediately by the continuing effort to provide workpapers to the Staff and other parties, and the receipt, review, and distribution of the testimony filed by the OPC has made it difficult to put together the filing called for in the Protective Order. The Company suggests that no party will be harmed by the requested delay. The sections designated as Highly Confidential or Proprietary are relatively limited, and the Company will provide the justification well before other parties are scheduled to respond to the Company's testimony.

WHEREFORE, for the reasons stated above, the Company requests that the five-day period set out in the Protective Order be extended an additional eight days, until May 24, 2002.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: James J. Cook /sh

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DATED: May 16, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via Hand-Delivery or U.S. Mail on this 16th day of May, 2002, on the following parties of record:

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