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October 30, 2000

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

FILED²
OCT 30 2000
Missouri Public
Service Commission

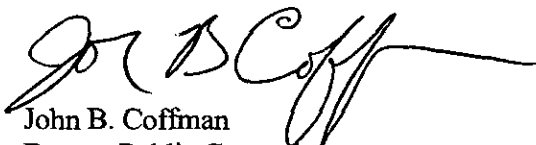
RE: Union Electric Company d/b/a AmerenUE
Case No. EM-2001-233

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Response To AmerenUE's Motion For Expedited Treatment**. Please "file" stamp the extra enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,


John B. Coffman
Deputy Public Counsel

JBC:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

OCT 30 2000

Missouri Public
Service Commission

Case No. EM-2001-233

In the matter of the Application of Union)
Electric Company (d/b/a AmerenUE) for)
an order to authorizing the sale, transfer)
and assignment of certain Assets, Real)
Estate Leased Property, Easements and)
Contractual Agreements to Central Illinois)
Public Service Company (d/b/a AmerenUECIPS))
and, in connection therewith, certain other)
related transactions.)

RESPONSE TO AMERENUE'S MOTION FOR EXPEDITED TREATMENT

Comes Now the Office of the Public Counsel (Public Counsel) and for its Response to AmerenUE's Motion For Expedited Treatment states as follows:

1. On October 6, 2000 Union Electric Company d/b/a AmerenUE (Company) filed an Application for Transfer of Assets (Application) pursuant to Section 393.190 RSMo. 1994 and 4 CSR 240-2.060, requesting that the Commission approve the sale and transfer of assets and liabilities associated with its "Metro East" service area, and also requesting certain ratemaking determinations. (Application, pp. 3-4). On October 26, 2000 Company filed its Amendment to Application for Transfer of Assets.

2. Company has also requested "expedited treatment" for this application, claiming that an increased "administrative cost" would be incurred if it does not receive Commission action on this application by February 15, 2001.

3. Public Counsel has begun its analysis of this Application and has issued data requests to Company. However, Public Counsel is initially concerned that certain requested ratemaking determinations requested in this case could unlawfully prejudice matters that are beyond the statutory authority granted to the Commission in Section 393.190 RSMo. 1994.

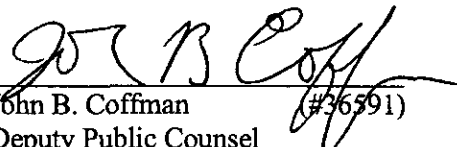
Furthermore, Public Counsel believes that the Commission should analyze the potential implications that granting the application would have upon the Joint Dispatch Agreement as well as the effects that approving this application might have upon the operation of the current alternative regulation plan as part of the stipulation and agreement adopted by the Commission in the application of Union Electric Company and Central Illinois Public Service Company to merge (Second Experimental Alternative Regulatory Plan or "EARP II") approved in Case No. EM-96-149. Since the Application was filed only 24 days ago, and discovery responses are currently outstanding, Public Counsel is unsure of the number of issues it may want to address in this case and is not yet certain whether or not it will request a hearing.

4. Rather than grant expedited treatment, the Commission should establish an early pre-hearing conference after Company has complied with initial discovery efforts, allowing the parties to confer regarding possibilities for settlement or to propose a procedural schedule recommendation.

WHEREFORE, Public Counsel respectfully requests that the Commission issue its order scheduling an early pre-hearing conference in this matter no sooner than 30 days from now.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: 
John B. Coffman (#36591)
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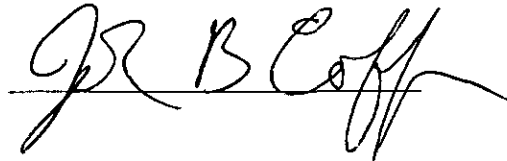
CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 30th day of October, 2000:

James J. Cook
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A handwritten signature in black ink, appearing to read "J B Coffey", written over a horizontal line.