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State of Missouri

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May 17, 2002

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

**RE: Union Electric Company,
Case No. EC-2002-1025**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies **RESPONSE TO REQUEST FOR ADDITIONAL TIME TO FILE RESPONSE**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

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

John B. Coffman
Acting Public Counsel

JBC:jb

cc: Counsel of Record

**BEFORE THE 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-2002-1025

**RESPONSE TO REQUEST FOR ADDITIONAL
TIME TO FILE RESPONSE**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response to Request for Additional Time to File Response states as follows:

1. On May 16, 2002 Union Electric Company d/b/a AmerenUE requested that the Public Service Commission (Commission) extend the deadline for responding to the procedural schedule proposed by Staff on May 6, 2002. This procedural schedule is supported by Public Counsel.

2. Company contacted Public Counsel to discuss settlement of this case for the first time today, May 17, 2002. Settlement discussions may continue in the future; however, extending procedural deadlines in this case will not necessarily hasten any settlement. In fact, approving the procedural schedule favored by Staff and Public Counsel would tend to focus the parties on the important issues in this case.

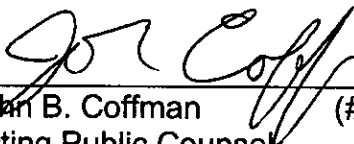
3. Over \$9 million in undisputed sharing credits are now due to ratepayers. According to Ameren Corporation's Quarterly Report (SEC Form 10-Q) filed on May 15, 2002, an estimate of the total value of Commission Staff and Public Counsel issues in this case could result in an approximately \$80 million of sharing credits.

Complicating the resolution in this case of sharing credits for the last year of the Experimental Alternative Regulation Plan II is the relevance of this issue to the proposal by Company to have the Commission adopt a brand new alternative regulation plan in Case No. EC-2002-1, which is scheduled for hearings during the month of July 2002.

WHEREFORE, Public Counsel respectfully requests that the Commission adopt the procedural schedule proposed by the Staff on May 6, 2002.

Respectfully submitted,

OFFICE OF THE Public Counsel

By: 
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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 17th day of May 2002:

STEVEN DOTTHEIM
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

JAMES COOK
Ameren Services Company
1901 Chouteau Avenue
PO Box 66149 (MC1310)
St Louis MO 63166-6149

A handwritten signature in black ink, appearing to read "J. Cook", is written over a horizontal line. The signature is stylized and cursive.