

April 24, 2002

**VIA FEDERAL EXPRESS**



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-2002-1025

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 **Response To Staff's Complaint And Proposal For Procedural Schedule For The Third And Final Year Of The Second UE Experimental Alternative Regulation.**

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James J. Cook".

James J. Cook  
Managing Associate General Counsel

JJC/vww

Enclosures

15879

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

The Staff of the Missouri Public	)	
Service Commission,	)	
	)	
Complainant,	)	
	)	
	)	
v.	)	Case No. EC-2002-1025
	)	
	)	
Union Electric Company, d.b.a.	)	
AmerenUE	)	
	)	
Respondent.	)	

**RESPONSE TO STAFF'S COMPLAINT AND PROPOSAL FOR PROCEDURAL  
SCHEDULE FOR THE THIRD AND FINAL YEAR OF THE SECOND UE  
EXPERIMENTAL ALTERNATIVE REGULATION PLAN**

COMES NOW Union Electric Company, d/b/a AmerenUE ("the Company") and in response to the Staff's filing of April 15, 2002 wherein Staff files a Complaint against the Company and proposes a procedural schedule.

1. The Company will respond to the Complaint when and if the Commission issues a Notice, as contemplated by the Commission's rules.

2. Concerning the proposed procedural schedule submitted by the Staff, the Company strongly opposes that proposal. The reasons for that opposition are more fully set out in the Company's Response to Staff Procedural Schedule Proposal.

3. In short, the pending major rate complaint case against the Company makes it virtually impossible to prepare testimony in the 6<sup>th</sup> Sharing Period cases simultaneously.

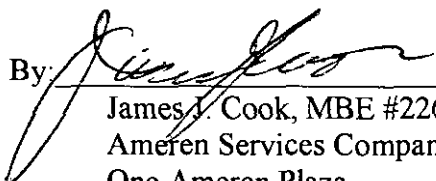
4. The Company proposes that first the Office of Public Counsel be directed to either file testimony or indicate that they will not be filing any testimony. Assuming that testimony, if any, is filed soon, the Company proposes the following schedule:

Company Rebuttal	August 23, 2002
Staff/OPC Surrebuttal	September 13, 2002
Statement of Positions	September 23, 2002
Hearings Begin	September 30, 2002

WHEREFORE, the Company will respond to the Staff's Complaint after, and if, the Commission issues a Notice. In addition, the Company objects to and opposes the Staff's proposed schedule and hereby submits a more reasonable schedule for this matter.

Respectfully submitted,

UNION ELECTRIC COMPANY

By:   
James A. Cook, MBE #22697  
Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P. O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-2237  
(314) 554-4014

DATED: April 24, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via Federal Express or U.S. Mail on this 24<sup>th</sup> day of April, 2002, on the following parties of record:

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

Diana M. Vulysteke  
Bryan Cave LLP  
One Metropolitan Square  
211 North Broadway, Ste. 3600  
St. Louis, MO 63102-2750

Steve Dottheim  
Office of the General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

General Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Governor Office Building  
Jefferson City, MO 65101

Ronald Molteni  
Office of the Attorney General  
221 W. High Street, P.O. 899  
Jefferson City, MO 65101

Robert C. Johnson/Lisa Langeneckert  
Peper, Martin, Jensen, Maichel & Hetlage  
720 Olive Street, 24<sup>th</sup> Floor  
St. Louis, MO 63101

Robin E. Fulton/R. Scott Reid  
Schnapp, Fulton, Fall, McNamara  
& Silvey L.L.C.  
135 E. Main Street, Box 151  
Fredericktown, MO 63645-0151

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
Jefferson City, MO 65101

Gary W. Duffy/James Swearengen  
Brydon, Swearengen & England PC  
312 E. Capitol Ave., P.O. Box 456  
Jefferson City, MO 65102

Paul H. Gardner  
Goller, Gardner & Feather  
131 East High Street  
Jefferson City, MO 65101

  
James J. Cook