

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴

AUG 16 2006

Marlyn Young,)
Complainant,)
v.)
Union Electric Company,)
d/b/a AmerenUE,)
Respondent.)

Case No. EC-2006-0283

Missouri Public
Service Commission

MOTION TO ADMIT PRO HAC VICE

COMES NOW Wendy K. Tatro, on behalf of Union Electric Company d/b/a AmerenUE, and pursuant to 4 CSR 240-2.040(3)(C), states as follows:

1. Movant is employed by Ameren Services Company as an Associate General Counsel, whose office is in Missouri, to-wit: 1901 Chouteau Avenue, St. Louis, Missouri 63103. Ameren Services Company is a subsidiary of Ameren Corporation providing among other services, legal services to the subsidiaries of Ameren Corporation, including Union Electric Company, d/b/a AmerenUE. The name of the real party in interest in this proceeding is Union Electric Company, d/b/a AmerenUE, and is the party being represented by Movant.

2. Movant is currently not a member of the Missouri Bar but is a member in good standing of the bars in the State of Kansas (#19232), United States Court of the District of Kansas, and the Tenth Circuit Court of Appeals. Movant is qualified to appear in all of these courts.

3. Mr. Thomas M. Byrne, Managing Assistant General Counsel for Ameren Services Company, is a member in good standing of the Missouri Bar having an office in


Missouri, to-wit: 1901 Chouteau Avenue, St. Louis, Missouri 63103. Mr. Byrne has entered his appearance as attorney of record.

4. No member of the legal department of Ameren Services Company is disqualified to appear in any courts in which Movant is admitted.

5. Pursuant to Missouri Supreme Court Rule 6.01 (m), Movant has paid the fee that is required which will allow her to appear before the Commission in this proceeding. A copy of the Clerk's acknowledgment is attached hereto and incorporated by reference.

WHEREFORE, for the reasons set forth above, Wendy K. Tatro respectfully requests that the Missouri Public Service Commission grant this motion and allow her to enter her appearance and represent Union Electric Company, d/b/a AmerenUE, in this proceeding in conjunction with Mr. Byrne before the Missouri Public Service Commission, and for such other and further relief as deemed equitable and just.

Respectfully submitted,

By 
Wendy K. Tatro
Licensed: State of Kansas
(Bar No.: 19232)
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (M/C 1310)
St. Louis, Missouri 63166-6149
(314) 554-3484
(314) 554-4014 (fax)

VERIFICATION

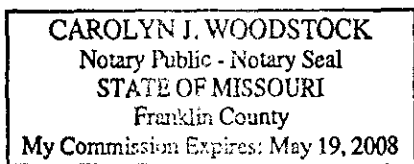
STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

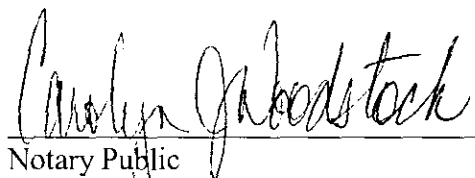
I, Wendy K. Tatro, an attorney for Union Electric Company d/b/a AmerenUE, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information and belief, and that I am authorized to file such document on behalf of Union Electric Company d/b/a AmerenUE.



Wendy K. Tatro

Subscribed and sworn to before me this 16 day of August, 2006.

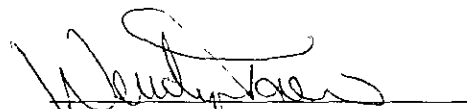




Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the attached service list, by first class mail, postage prepaid, or by electronic mail, on this 16 day of August, 2006.



Wendy K. Tatro



THOMAS F. SIMON
CLERK

CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150
JEFFERSON CITY, MISSOURI
65102

TELEPHONE
(573) 751-4144

August 16, 2006

This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Wendy K. Tatro appearing in Marlyn Young vs. Union Electric Company, d/b/a Ameren UE, Case No. EC-2006-0283 to be filed with the Missouri Public Service Commission.

A handwritten signature in black ink, appearing to read "Thomas F. Simon", with a large, stylized flourish at the end.

Thomas F. Simon, Clerk