

**Ameren Services**

One Ameren Plaza  
1901 Chouteau Avenue  
PO Box 66149  
St. Louis, MO 63166-6149  
**314.621.3222**

314.554.2237  
314.554.4014 (fax)  
JJCOOK@AMEREN.COM

June 28, 2002

**VIA HAND DELIVERY**



Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
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 **Explanation of Classification of Information in Union Electric Company's Cross-Surrebuttal Testimony**.

Very truly yours,

*James J. Cook / sh*

James J. Cook  
Managing Associate General Counsel

JJC/mlh

**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.	)	

**EXPLANATION OF CLASSIFICATION OF INFORMATION IN  
UNION ELECTRIC COMPANY'S CROSS-SURREBUTTAL TESTIMONY**

COMES NOW Union Electric Company, d/b/a AmerenUE ("Company"), and submits its Explanation of Classification of Information in Union Electric Company's Cross-Surrebuttal Testimony pursuant to Section I of the Protective Order issued September 5, 2001.

1. On June 24, 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. Portions of Pages 12 and 22 of Warner L. Baxter's Cross-Surrebuttal Testimony were marked "Proprietary" because they contain "confidential or private technical, financial and business information". The information included in these pages concerns the Company SO<sub>2</sub> allowance inventory. The public disclosure of the size of that inventory, or any details concerning the value of the inventory, or the value of certain transactions could adversely affect

the Company's ability to manage that inventory. It would adversely affect the ability of the Company to buy, sell and otherwise deal in these assets in the open marketplace - to the detriment of the Company and its customers.

3. Portions of Pages 2 through 11 of James C. Moore's Cross-Surrebuttal Testimony were marked "Proprietary" because they contain "confidential or private technical, financial and business information". The information included in these pages concerns the Company SO<sub>2</sub> allowance inventory. The public disclosure of the size of that inventory, or any details concerning the value of the inventory, or the value of certain transactions could adversely affect the Company's ability to manage that inventory. It would adversely affect the ability of the Company to buy, sell and otherwise deal in these assets in the open marketplace - to the detriment of the Company and its customers.

4. Portions of Pages 3, 10, 11, 13 and 14 of Richard A. Voytas' Cross-Surrebuttal Testimony were marked "Highly Confidential" because they contain "market-specific information" relating to services offered in competition with others. If this information were disclosed to the public it would compromise the Company's ability to buy or sell electricity at reasonable prices, and therefore would be harmful to Missouri retail customers.

WHEREFORE, as required by the terms of the Protective Order cited above, the Company hereby submits its Explanation of the Classification of Information included in the Company's Cross-Surrebuttal Testimony.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By: James J. Cook / sh  
James J. Cook, MBE #22697  
Managing Associate General Counsel

Steven R. Sullivan, MBE #33102  
Vice President, General Counsel  
& Secretary

One Ameren Plaza  
1901 Chouteau Avenue  
P. O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
[jjcook@ameren.com](mailto:jjcook@ameren.com)  
314-554-2237  
[srsullivan@ameren.com](mailto:srsullivan@ameren.com)  
314-554-2098  
314-554-4014 (fax)

OF COUNSEL:

Robert J. Cynkar  
Victor J. Wolski  
Gordon D. Todd  
Cooper & Kirk, PLLC  
1500 K Street, N.W.  
Suite 200  
Washington, D.C. 20005  
202-220-9600  
202-220-9601 (fax)

DATED: June 28, 2002

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via Hand Delivery, Federal Express or U.S. Mail on this 28th day of June, 2002, on the following parties of record:

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

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

Steve Dottheim  
Chief Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Robert C. Johnson, Esq.  
Lisa C. Langeneckert, Esq.  
Law Office of Robert C. Johnson  
720 Olive Street, Suite 2400  
St. Louis, MO 63101

Dennis Frey  
Assistant General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

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

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

Robin E. Fulton  
Schnapp, Fulton, Fall, Silver &  
Reid, L.L.C.  
135 East Main Street  
P.O. Box 151  
Fredericktown, MO 63645

R. Larry Sherwin  
Assistant Vice President  
Regulatory Administration  
Laclede Gas Company  
720 Olive Street, Room 1415  
St. Louis, MO 63101

Michael C. Pendergast  
Assistant Vice President &  
Associate General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101

Ronald Molteni  
Assistant Attorney General  
Supreme Court Building  
221 West High Street  
P.O. Box 899  
Jefferson City, MO 65102

Tim Rush  
Kansas City Power & Light Company  
1201 Walnut  
Kansas City, MO 64141

James M. Fischer  
Fischer & Dority, P.C.  
101 Madison, Suite 400  
Jefferson City, MO 65101

Samuel E. Overfelt, Esq.  
Law Office of Samuel E. Overfelt  
618 East Capitol Avenue  
P.O. Box 1336  
Jefferson City, MO 65102

James J. Cook / sh  
James J. Cook