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May 30, 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-2002-1

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of REQUEST FOR LEAVE TO FILE REVISED REBUTTAL TESTIMONY, PREPARED TESTIMONY OF DAVID J. EFFRON, TED ROBERTSON AND RYAN HIND (NP AND P). 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
Acting Public Counsel a

JBC:jb

cc: Counsel of Record

2. On May 17, 2002 Public Counsel filed its Notice Regarding Classified Information, informing the Commission that Public Counsel and Union Electric Company d/b/a AmerenUE (Company) had initiated discussions regarding the declassification of significant portions of the rebuttal testimonies referenced above. The purpose of such discussions was to seek agreement regarding the declassification of as much testimony as possible in an effort to follow Missouri's Open Records Law and Commission policy as expressed in its Order Establishing Protective Order in this case.

3. Following discussions on this matter, Company and Public Counsel were able to agree to declassify significant portions of the three testimonies referenced above. Company has expressed no objection to refiling the rebuttal testimonies of Ted Robertson and David J. Effron without any "Proprietary" or "Highly Confidential" classifications. Company has also expressed that it has no objection to the declassification of significant portions of the rebuttal testimony of Ryan Kind as well as significant portions of the attached schedules which had been previously filed as "Proprietary".

4. Public Counsel thereby is filing today revised copies of the testimony of David J. Effron, Ted Robertson, and Ryan Kind. No changes have been made to actual testimony as it was originally filed on May 10, 2002. With the only exception of typographical corrections made on pages 21 and 33 of Ted Robertson's rebuttal testimony, the only revisions made today to these three prepared testimonies involves the declassification of certain testimony and schedules previously filed on May 10, 2002.

WHEREFORE, Public Counsel respectfully requests that the Commission grant leave to allow the filing of the following revised versions of these testimonies:

Ted Robertson Rebuttal

David Effron Rebuttal

Ryan Kind Rebuttal (NP)

Ryan Kind Rebuttal (P)

Respectfully submitted,

OFFICE THE PUBLIC C UNS

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 30th day of May 2002:

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