

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

In the Matter of Union Electric Company	)	
d/b/a AmerenUE for Authority to File	)	
Tariffs for Increasing Rates for Electric	)	<b><u>Case No. ER-2007-0002</u></b>
Service Provided to Customers in the	)	
Company's Missouri Service Area	)	

**PUBLIC COUNSEL'S SECOND AMENDMENT TO MOTION TO COMPEL  
DISCOVERY AND REQUEST FOR EXPEDITED TREATMENT**

COMES NOW the Office of the Public Counsel and for its Second Amendment to Motion to Compel Discovery and Request for Expedited Treatment states as follows:

1. Section (2) of Public Counsel's Motion included Data Request (DR) Numbers 2248 and 2249. Responses to these DRs were provided by Union Electric (UE) in a redacted format with pages missing. These documents were reviewed by Judge Voss along with the documents in response to DR Number 2220. Judge Voss determined that additional information was to be provided to Public Counsel from these redacted and incomplete documents. UE provided the additional information for DRs 2248 and 2249 to Public Counsel on March 13, 2007. Therefore, Public Counsel respectfully waives its Motion to Compel Discovery for DR Numbers 2248 and 2249.
2. Section (2) of Public Counsel's Motion also included DR Numbers 2139, 2140, 2151 and 2152 which UE had asserted were voluminous. UE provided documents in response to all of these DRs on March 13, 2007. Therefore, Public Counsel respectfully waives its Motion to Compel Discovery for DR Numbers 2139, 2140, 2151 and 2152.

3. Section (2) of Public Counsel's Motion also included DR Numbers 2245, 2250, 2260, and 2265HC. Full and complete responses to all of these DRs were received by Public Counsel on March 13, 2007. Therefore, Public Counsel respectfully waives its Motion to Compel Discovery for DR Numbers 2245, 2250, 2260, and 2265HC.

**WHEREFORE**, the Office of the Public Counsel respectfully waives its Motion to Compel Discovery for DR Numbers 2139, 2140, 2151, 2152, 2245, 2248, 2249, 2250, 2260, and 2265HC and asks the Commission to issue an Order to Compel Discovery on the remaining DRs, as amended, in full and completely, by 5:00 pm on Friday, March 16, 2007, and for such other and additional relief that is necessary and proper.

Respectfully submitted,

OFFICE OF THE Public Counsel

**/s/ Christina L. Baker**

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 14<sup>th</sup> day of March 2007:

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