

FILED<sup>2</sup>

SEP 12 2007

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

Irene Dsouza,  
Complainant,

Missouri Public  
Service Commission

v.

Case No. EC-2007-0442

Union Electric Company,  
d/b/a AmerenUE,  
Respondent.

**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 her 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)

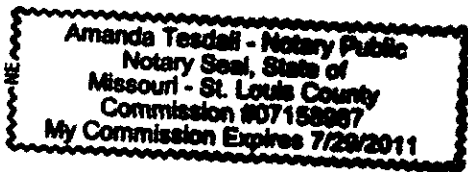
VERIFICATION


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

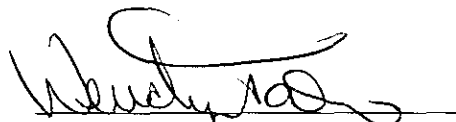
Subscribed and sworn to before me this 11 day of September, 2007.



  
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 12 day of September, 2007.

  
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

September 12, 2007

This will hereby acknowledge receipt of \$200 as required by Rule 6.01(m) for Wendy K. Tatro appearing in Marilyn Young vs. Union Electric Company d/b/a Ameren UE, Case No. EC-2007-0273 and Irene Dsouza vs. Union Electric company d/b/a Ameren UE, Case No. EC-2007-0442 to be filed with the Public Service Commission of Missouri.

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

Thomas F. Simon, Clerk