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October 23, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²

OCT 23 2001

Missouri Public
Service Commission

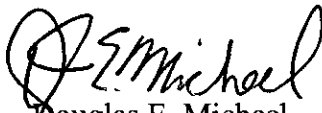
**RE: Union Electric Company d/b/a AmerenUE,
Case No. GT-2002-70**

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 8 copies of **Joint Motion to Suspend Procedural Schedule and Motion for Expedited Treatment**. Please "file stamp" the extra-enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,


Douglas E. Micheel
Senior Public Counsel

DEM:kh

cc: Counsel of record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

OCT 23 2001

Missouri Public
Service Commission

In the Matter of the Tariff Filing of Union Electric)
Company d/b/a AmerenUE to Incorporate into the)
Company's Tariff a Revised Procedure for the)
Development of Estimated Customer Natural Gas)
Usage and Clarify and Update the Tariff Provisions)
Describing the Company's Current Process for)
Estimating Customer Gas Usage)

Case No. GT-2002-70

**JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE AND MOTION
FOR EXPEDITED TREATMENT**

COME NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), the Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("Public Counsel") (jointly referred to herein as "the Parties") and hereby move that the Missouri Public Service Commission ("Commission") issue an order, on an expedited basis pursuant to 4 CSR 240-2.080 (17), suspending the procedural schedule established for this case. In support hereof, the Parties state as follows:

1. This proceeding was initiated on July 27, 2001 when AmerenUE filed proposed tariffs with the Commission that revised its methodology for estimating gas usage in situations where it is unable to obtain actual meter readings. The proposed tariffs carried an effective date of August 29, 2001.

2. In response to motions filed by the Public Counsel, the Commission suspended the effective date of the proposed tariff sheets until December 27, 2001. In

addition, the Commission issued an order adopting a procedural schedule for this case that had been jointly proposed by the Parties.

3. In accordance with the procedural schedule, AmerenUE and the Commission Staff filed their direct testimony on October 15, 2001. Pursuant to the existing schedule, the Public Counsel is required to file rebuttal testimony on October 29, 2001, and a hearing is to be held on November 7, 2001.

4. The Parties have been conducting informal settlement discussions in an effort to resolve their differences in this proceeding. Based on these discussions, the Parties have reached an agreement in principle on tariff language that should be approved by the Commission to address situations where it is necessary for AmerenUE to estimate gas usage. The Parties are currently working to incorporate their settlement into a Stipulation and Agreement that they anticipate will be filed with the Commission in the next few days.

5. As a consequence of the foregoing, the Parties request that the Commission promptly suspend the procedural schedule for this case to permit the Parties to devote their efforts to finalizing the Stipulation and Agreement. The Parties request that the Commission issue its order as promptly as possible, and in any event prior to October 29, 2001, the date that the rebuttal testimony of the Public Counsel is due. The Parties note that there is good cause to issue an order suspending the procedural schedule immediately, since all of the Parties to this proceeding are Parties to this Motion. In addition, there will be no negative effect on AmerenUE's customers or the general public, if the Commission issues its order by the date requested.

6. The Parties note that this pleading was filed as soon as an agreement in principle was reached among them to resolve this case.

WHEREFORE, for the reasons stated herein AmerenUE, the Commission Staff and the Office of the Public Counsel request that the Commission promptly issue an order suspending the procedural schedule for this case.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AMERENUE

By Thomas M. Byrne

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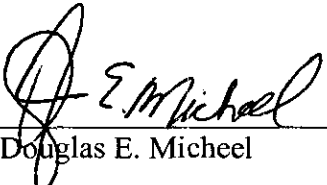
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record on this 23rd day of October, 2001.



Douglas E. Micheel