

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

In re: Union Electric Company's)	
2005 Utility Resource Filing pursuant to)	Case No. EO-2006-0240
4 CSR 240 – Chapter 22)	

**MOTION TO ESTABLISH DOCKET AND
FOR PROTECTIVE ORDER**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”), pursuant to 4 CSR 240-22.080 and 4 CSR 240-2.085, and hereby requests that the Commission establish a docket for the purpose of receiving AmerenUE’s Utility Resource Filing pursuant to Chapter 22 of the Commission’s administrative rules, and requests the Commission to issue its standard Protective Order for “Highly Confidential” and “Proprietary” information as defined by the Commission. In support of its Motion, AmerenUE states as follows:

1. On this date, AmerenUE submitted its Utility Resource Filing (sometimes referred to as an “integrated resource plan” or “IRP”) pursuant to Chapter 22 of the Commission’s administrative rules. The IRP was submitted via the Commission’s Electronic Filing and Information System (“EFIS”) and consists of 29 volumes. EFIS assigned Case No. EO-2006-0240 to this filing.

2. 4 CSR 240-22.080(4) provides that the Commission shall establish a docket for the purpose of receiving the IRP. By this Motion, AmerenUE hereby requests the Commission to designate the docket number assigned by EFIS as the docket contemplated by 4 CSR 240-22.080(4).

3. 4 CSR 240-22.080(4) further provides that the Commission shall issue an order that establishes an early intervention deadline, sets an early prehearing conference and provides notice. AmerenUE hereby requests that the Commission issue such an order.

4. In addition to its request reflected above, AmerenUE seeks a protective order in this case to protect the proprietary and highly confidential information reflected in the IRP.

5. The IRP is replete with trade secrets and confidential or private technical, financial or business information. For example, the IRP contains detailed information about AmerenUE's capacity reserve margins, detailed information about production cost inputs such as fuel costs, and other detailed information about AmerenUE's cost structure. There are many other examples of highly confidential or proprietary information contained throughout the entire IRP that are too numerous to list here. Release of information of the type contained in the IRP, that would otherwise not be made available to the public, could have significant adverse effects on AmerenUE's operations and may conflict with or may be in violation of SEC laws and regulations. The information contained in the IRP would be very valuable to AmerenUE's suppliers and competitors and would place AmerenUE at a severe competitive disadvantage if not protected from disclosure via a protective order. That severe disadvantage would also harm ratepayers as it could lead to higher operating costs, lower revenues, or both, which in turn could lead to higher rates for customers. The IRP and the information contained therein also cannot be found in any format in any other public document.

WHEREFORE, AmerenUE respectfully requests that the Commission (a) establish the docket number assigned by EFIS upon filing of the IRP as the docket contemplated by 4 CSR 240-22.080(4); (b) issue an order that establishes an early intervention deadline, sets an early

prehearing conference and provides notice, and (c) issue its standard protective order in this case to protect the highly confidential and proprietary information contained in the IRP.

Dated: December 5, 2005

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/s/ Thomas M. Byrne

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on the following parties on the 5th day of December, 2005.

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