

In the matter of an Investigation into)
the Tree Trimming Policies of Union) Case No. EW-2004-0583
Electric Company d/b/a AmerenUE.)

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE” or the “Company”), in accordance with 4 CSR 240-2.085, and, for its Motion for issuance of the Missouri Public Service Commission’s (“Commission”) standard-form protective order, states as follows:

3. Therefore, because there is a potential for public disclosure of highly confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.” The Commission has historically issued protective orders in general rate cases and other cases similar to the present one.

WHEREFORE, the Company, pursuant to 4 CSR 240-2.085, respectfully requests that the Commission:

- (a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By Thomas M. Byrne
Its Attorney

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Dated: September 15, 2005

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail on this 15th day of September, 2005, on the following parties of record:

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