BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company) d/b/a AmerenUE's Tariffs To Increase Its) Annual Revenues for Electric Service)

Case No. ER-2008-0318

MISSOURI INDUSTRIAL ENERGY CONSUMERS' REQUEST TO ADMIT COUNTER-DESIGNATIONS TO AMERENUE DESIGNATIONS OF MAURICE BRUBAKER'S DEPOSITION

Comes now the Missouri Industrial Energy Consumers (MIEC) and requests that the following designated portions of the deposition of MIEC witness Maurice Brubaker be admitted into the record in this case in response to portions of this deposition admitted by request of AmerenUE:

- Pages 20-22 in their entirety, in counter to AmerenUE's designation of P. 20, l. 10-14 and P. 22, lines 21-25.
- Pages 47, l. 1 through 49, l. 9, in counter to AmerenUE's designation of P. 47, l. 24-25 and P. 48, l. 1-8.

Admission of these counter-designations are necessary to place the designations by AmerenUE

in reasonable context and to provide a true and complete record for decision by the Commission.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 12th day of December 2008.

/s/ Diana Vuylsteke