

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

In the matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for )  
an order to authorizing the sale, transfer )  
and assignment of certain Assets, Real )  
Estate, Leased Property, Easements and )  
Contractual Agreements to Central Illinois )  
Public Service Company (d/b/a AmerenCIPS) )  
and, in connection therewith, certain other )  
related transactions. )

Case No. \_\_\_\_\_

**MOTION TO ADMIT PRO HAC VICE**

COMES NOW Edward C. Fitzhenry, 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.

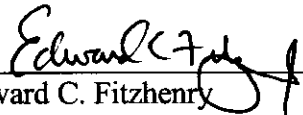
2. Movant is currently not a member of the Missouri Bar but is in the process of preparing the application to become a member of said Bar. Movant is a member in good standing of the bars in the State of Illinois (#6180218), United States Court of the Southern District of Illinois, and the Seventh Circuit Court of Appeals. Movant is qualified to appear in all of these courts.

3. Mr. Joseph H. Raybuck, 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. Raybuck will enter his appearance as attorney of record along with Movant.

4. No member of the legal department of Ameren Services Company is disqualified to appear in any courts in which Movant is admitted.

Wherefore, for the reasons set forth above, Edward C. Fitzhenry respectfully requests that the Missouri Public Service Commission grant this motion and allow him to enter his appearance and represent Union Electric Company, d/b/a AmerenUE, in this proceeding in conjunction with Mr. Raybuck before the Missouri Public Service Commission, and for such other and further relief as deemed equitable and just.

Respectfully submitted,

By   
Edward C. Fitzhenry  
Licensed: State of Illinois  
ARDC #6180218  
Ameren Services Company  
1901 Chouteau Avenue  
P.O. Box 66149 (M/C 1310)  
St. Louis, Missouri 63166-6149  
(314) 554-3533  
(314) 554-4014 (fax)

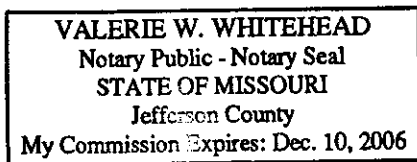
VERIFICATION

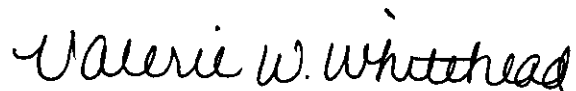
STATE OF MISSOURI     )  
                                  ) SS.  
CITY OF ST. LOUIS     )

I, Edward C. Fitzhenry, 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.

  
\_\_\_\_\_  
Edward C. Fitzhenry

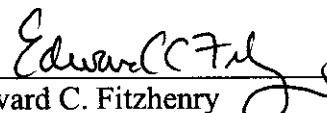
Subscribed and sworn to before me this 25<sup>th</sup> day of August, 2003.



  
\_\_\_\_\_  
Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the Staff of the Missouri Public Service Commission and Office of Public Counsel by electronic mail on this 25<sup>th</sup> day of August, 2003.

  
\_\_\_\_\_  
Edward C. Fitzhenry