

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of an Investigation into an	)	
Incident in December 2005 at the	)	
Taum Sauk Pumped Storage Project	)	Case No. ES-2007-0474
Owned and Operated by the	)	
Union Electric Company d/b/a AmerenUE.	)	

**MOTION TO ADMIT PRO HAC VICE**

COMES NOW Rebecca Wickhem House, 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 a partner with the law firm of Foley & Lardner, LLP whose office is in Milwaukee, Wisconsin, to wit: 777 East Wisconsin Avenue, Milwaukee, WI 53202-5306. 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 a member in good standing of the bar in the State of Wisconsin (#1029185), U.S. District Court for the Eastern District of Wisconsin and U.S. District Court for the Western District of Wisconsin. Movant is qualified to appear in all of these courts.

3. Mr. Thomas M. Byrne, 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. Byrne has entered his appearance as attorney of record.

4. No member of Foley & Lardner, LLP is disqualified to appear in any courts in which Movant is admitted.

5. Pursuant to Missouri Supreme Court Rule 6.01 (m), Movant has paid the fee that is required which will allow her to appear before the Commission in this proceeding. A copy of the Clerk's acknowledgment is attached hereto and incorporated by reference.

WHEREFORE, for the reasons set forth above, Rebecca Wickhem House respectfully requests that the Missouri Public Service Commission grant this motion and allow her to enter her appearance and represent Union Electric Company, d/b/a AmerenUE, in this proceeding in conjunction with Mr. Byrne before the Missouri Public Service Commission, and for such other and further relief as deemed equitable and just.

Respectfully submitted,

By 

Rebecca Wickhem House  
Licensed: State of Wisconsin  
(Bar No.: 1029185)  
Foley & Lardner, LLP  
777 East Wisconsin Avenue  
Milwaukee, WI 53202-5306  
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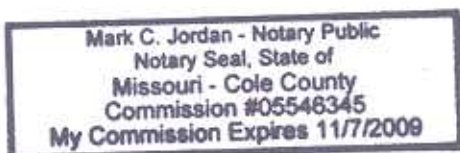
VERIFICATION


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

I, Rebecca Wickhem House, 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.

  
Rebecca Wickhem House

Subscribed and sworn to before me this 23<sup>rd</sup> day of July, 2007.



  
Notary Public     Mark C. Jordan

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the attached service list, by first class mail, postage prepaid, or by electronic mail, on this 24<sup>th</sup> day of July, 2007.

  
Thomas M. Byrne



THOMAS F. SIMON  
CLERK

CLERK OF THE SUPREME COURT  
STATE OF MISSOURI  
POST OFFICE BOX 150  
JEFFERSON CITY, MISSOURI  
65102

TELEPHONE  
(573) 751-4144

July 24, 2007

*This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Rebecca Wickhem House, appearing in the Matter of an Investigation into an Incident in December 2005 at the Taum Sauk Pumped Storage Project Owned and Operated by the Union Electric Company d/b/a AmerenUE, Case No. ES-2007-0474, before the Public Service Commission, State of Missouri.*

A handwritten signature in cursive script, appearing to read "Thomas F. Simon", written over a horizontal line.

Thomas F. Simon, Clerk