

THE **STOLAR**
PARTNERSHIP LLP

ATTORNEYS AT LAW

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December 27, 2004

VIA EFIS FILING

Secretary, Chief Regulatory Law Judge
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

Re: MoPSC Case No. EA-2005-0180

Dear Mr. Roberts:

Please find included with this EFIS filing the Response of Missouri Energy Group to AmerenUE Motion to Adoption of Procedural Schedule and Motion for Expedited Treatment. I would appreciate your bringing this filing to the attention of the Commission.

Thank you for your assistance in this matter. Please contact me if you have any questions.

Yours truly,



Lisa C. Langeneckert

mkp
cc/enc: All parties of record

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

Application of Union Electric Company)	
for a Certificate of Public Convenience and)	
necessity authorizing it to construct, install)	
own, operate, control, manage and maintain)	Case No. EA-2005-0180
electric plant, as defined in §386.020(14) RSMo.)	
to provide electric service in a portion of)	
New Madrid County, Missouri, as an)	
extension of its existing certificated area)	

**RESPONSE OF MISSOURI ENERGY GROUP
TO AMERENUE MOTION FOR ADOPTION
OF PROCEDURAL SCHEDULE
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Missouri Energy Group (“MEG”), and for its reponse to the Motion of Union Electric Company d/b/a AmerenUE (AmerenUE) for Adoption of Expedited Procedural Schedule and Motion for Expedited Treatment (the “Motion”) states as follows:

1. On December 20, 2004 AmerenUE filed its Motion for Expedited Treatment of its Application for a Certificate of Convenience and Necessity and a proposed Expedited Procedural Schedule.
2. On December 23, 2004 this Commission entered an Order requiring Responses to AmerenUE’s Motion by December 27, 2004.
3. MEG filed its Application to Intervene earlier today.
4. MEG opposes the AmerenUE Motion. While the MEG understands that there are certain time pressures which have caused AmerenUE to ask for an expedited schedule, MEG contends that the AmerenUE schedule is unduly burdensome in its current

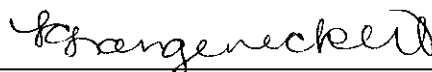
accelerated form and does not allow adequate time to prepare testimony or to prepare for the hearing before the Commission in this matter.

5. In a conference call this date among all the parties except Noranda Aluminum, the Staff of the Missouri Public Service Commission ("Staff") proposed an expedited schedule which is less burdensome. It is MEG's understanding that all other parties on the conference call except AmerenUE are agreeable to Staff's schedule. MEG is also agreeable to Staff's proposed schedule, provided that it imposes no time limit on the serving of Data Requests (DRs) as proposed by AmerenUE. MEG is strongly opposed to imposition of any such time limit. Because of the expedited schedule, issues may not be developed until the late stages of the procedural schedule, and any limit on discovery could deny due process to an active party.

WHEREFORE, MEG respectfully requests that the Commission deny AmerenUE's Motion for Adoption of an Expedited Procedural Schedule and instead adopt the proposed schedule submitted by the Staff on this date upon the understanding that there will be no time limit on the serving of DRs by any party.

Respectfully submitted,

THE STOLAR PARTNERSHIP LLP

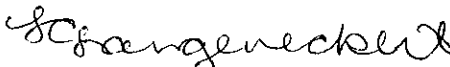


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Attorney for the Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this 27th day of December, 2004 caused a copy of the foregoing to be served on all persons on the official service list in Case No. EA-2005-0180.



Lisa C. Langeneckert