

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

In Re: Union Electric Company's)	
2008 Utility Resource Filing pursuant to)	Case No. EO-2007-0409
4 CSR 240 – Chapter 22.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company), pursuant to 4 CSR 240-2.085(1) and hereby requests the Commission to issue a Protective Order for “Highly Confidential” and “Proprietary” information as defined by the Commission. In support of its Motion, AmerenUE states as follows:

1. On April 19, 2007, AmerenUE requested the Missouri Public Service Commission (Commission) open this case for its 2008 Integrated Resource Plan (IRP) filing.

2. For work leading up to the 2008 IRP filing as well as during any procedural schedule issued by the Commission in this case, there will be information released to the Commission and to parties in the case (which include all parties from Case No. EO-2006-0240), some of which will contain Proprietary or Highly Confidential information. Consequently, in order for AmerenUE to comply with 4 CSR 240-2.085(2), which reads in pertinent part as follows: “Pleadings, testimony, or briefs shall not contain highly confidential or proprietary information unless a protective order has been issued ...”, AmerenUE is requesting that the Commission issue a protective order in advance of the actual IRP filing so that the Company can provide Highly Confidential or Proprietary information.

3. In addition, a protective order is also sought to protect any pre-existing products, software, materials and methodologies proprietary to the consultants engaged by AmerenUE to assist in the preparation of its 2008 IRP filing, including any trade secrets, know-how,

methodologies and processes related to the consultants' products or services, all of which are required to remain the sole and exclusive property of the consultants or their suppliers. Such material will be available to those parties participating in the development of the 2008 IRP plan, but AmerenUE requests the Commission order that parties' use of that material be limited to that purpose and to this case.

4. The Company and its customers would be harmed absent the entry of a protective order because the upcoming IRP filing, which will examine a wide spectrum of matters relating to the Company's business, will involve sensitive financial and business information including information relating to the Company's underlying cost structure, resource planning, energy position, capacity position and other information, the public release of which would damage the Company and its customers. Release of information that cannot be found in any format in any other public documents would have significant adverse effects on AmerenUE's operations and may conflict with or may be in violation of SEC laws and regulations. Competitors could gain access to information that, in competitors' hands, would be harmful to AmerenUE, and AmerenUE could lose business opportunities or other strategic advantages which depend upon the confidentiality of such information. Such business losses would ultimately harm AmerenUE's customers by reducing its revenues or increasing its costs.

WHEREFORE, AmerenUE respectfully requests that the Commission issue its standard Protective Order and to specifically provide protection for the proprietary information belonging to consultants hired by AmerenUE.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

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Dated: June 11, 2007

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11th day of June, 2007.

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