

September 12, 2002

VIA FEDERAL EXPRESS



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED⁴
SEP 13 2002
Missouri Public
Service Commission

Re: Case No. EC-2002-1035
Sharon Greene v. Union Electric d/b/a AmerenUE

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Motion to Dismiss** in this matter.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Cook", is written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/cjs
Enclosures

cc: Parties on Attached Service List

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴
SEP 13 2002
Missouri Public
Service Commission

Sharon Greene,

Complainant,

v.

Union Electric Company d/b/a AmerenUE,

Respondent.

Case No. EC-2002-1035

MOTION TO DISMISS

COMES NOW, Union Electric Company d/b/a AmerenUE, by and through its attorney, and respectfully requests that the Missouri Public Service Commission ("MPSC") dismiss the complaint filed by Complainant Sharon Greene (Case No. EC-2002-1035) against Respondent. In support thereof, Respondent states as follows:

1. On or about April 19, 2002, Complainant Sharon Greene ("Petitioner") filed a Complaint with the MPSC regarding several allegations made by her against AmerenUE. On April 25, 2002, the MPSC issued its Notice of Complaint and Respondent timely filed its Answer on May 23, 2002.

2. On June 11, 2002, a prehearing conference was held. At that time, the Regulatory Law Judge took great pains to explain the Commission's procedures to Complainant. During this conference, the Complainant and Respondent agreed to a procedural schedule, which was later presented to the Commission.

3. On July 25, 2002, MPSC issued an Order setting the procedural schedule in this case wherein Ms. Greene was required to file her direct testimony on or before August 26, 2002.

4. To date, the Complainant has failed to file her testimony in this case.

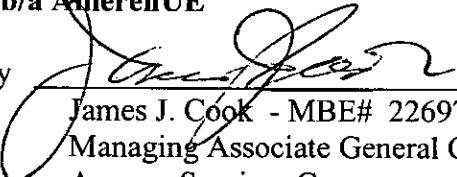
WHEREFORE, for the foregoing reason, Respondent requests that the MPSC dismiss with prejudice Case No. EC-2002-1035 or alternatively, enter an Order in this case in favor of Union Electric Company, or such other and additional relief as may be just and proper.

Dated: September 12, 2002

Respectfully submitted,

Union Electric Company
d/b/a AmerenUE

By



James J. Cook - MBE# 22697
Managing Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue (MC 1310)
P.O. Box 66149
St. Louis, Missouri 63166-6149
(314) 554-2237
(314) 554-4014 (fax)
jcook@ameren.com

CERTIFICATE OF SERVICE

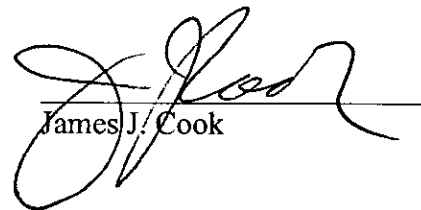
CASE NO: EC-2002-1035

I hereby certify that a copy of the foregoing was served via first class U.S. mail on this 12th day of September, 2002, on the following parties of record:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Sharon Greene
2805 Annapolis
St. Louis, MO 63114



James J. Cook