

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

Application of Union Electric Company)	
for a Certificate of Public Convenience and)	
Necessity authorizing it to construct, install,)	Case No. EA-2005-0180
own, operate, control, manage and maintain)	
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)	

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 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.

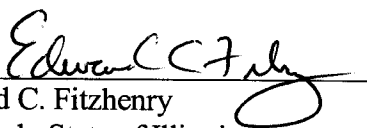
3. Mr. Joseph H. Raybuck, Managing Assistant General Counsel for Ameren Services Company, is a member in good standing of the Missouri Bar having an office in Missouri, to-wit: 1901 Chouteau Avenue, St. Louis, Missouri 63103. Mr. Raybuck will enter his appearance as attorney of record.

4. No member of the legal department of Ameren Services Company 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 him 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, 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,

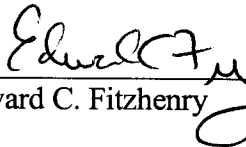
By 
Edward C. Fitzhenry
Licensed: State of Illinois
ARDC #6180218
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (M/C 1310)
St. Louis, Missouri 63166-6149
(314) 554-3533
(314) 554-4014 (fax)

Dated: January 28, 2005

VERIFICATION

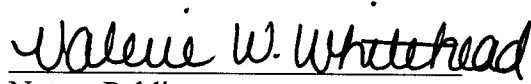
STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

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.

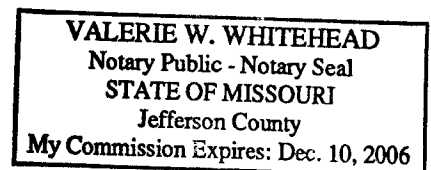


Edward C. Fitzhenry

Subscribed and sworn to before me this 28th day of January, 2005.

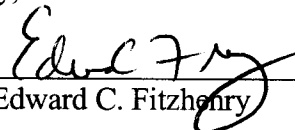


Notary Public



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, on this 28 day of January, 2005.



Edward C. Fitzhenry




THOMAS F. SIMON
CLERK

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

TELEPHONE
(573) 751-4144

January 26, 2005

This will hereby acknowledge receipt of \$100 as required by Rule 6.01(m) for Edward C. Fitzhenry, appearing in the Matter of the Application of Union Electric Company for a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Control, Manage and Maintain Electric Plant, as Defined in Section 386.020(14), RSMo, to Provide Electric Service in a Portion of New Madrid County, Missouri, as an Extension of its Existing Certificated Area., Cause No. Ea-2005-0180, before the Public Service Commission, State of Missouri.



Thomas F. Simon, Clerk