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May 7, 2002

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

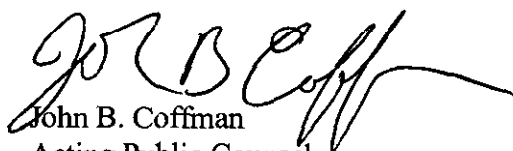
**RE: Union Electric Company,
Case No. EC-2002-**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies **MOTION TO CONSOLIDATE**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,


John B. Coffman
Acting Public Counsel

JBC:jb

cc: Counsel of Record

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

OFFICE OF THE PUBLIC COUNSEL,)	
Complainant,)	
)	
vs.)	Case No. EC-2002-
)	
UNION ELECTRIC COMPANY,)	
d/b/a AmerenUE,)	
Respondent.)	

MOTION TO CONSOLIDATE

COMES NOW the Office of the Public Counsel (Public Counsel) pursuant to Commission rule 4 CSR 240-2.110(3) and for its Motion to Consolidate states as follows:


1. On this date, Public Counsel filed this Complaint against Union Electric Company d/b/a AmerenUE (Company) regarding areas of disagreement over the calculation of sharing credits for the third year of the Second Experimental Alternative Regulation Plan (EARP II) in Case No. EM-96-149. Public Counsel believes that this Complaint involves questions of fact and law that are related to the issues in Case No. EM-96-149, and thus should be consolidated with that case.

2. On April 16, 2002, the Staff of the Commission (Staff) filed a similar Complaint regarding the areas of disagreement it has with Company regarding the third year of the EARP II. Staff has also moved to consolidate its Complaint, Case No. EC-2002-1025 with Case No. EM-96-149.

WHEREFORE, Public Counsel requests that the Commission consolidate Case No. EM-96-149 and this Complaint relating to the third year of the EARP II.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: 
John B. Coffman (#36591)

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 9th day of January 2002:

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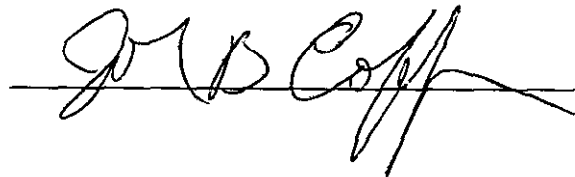
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A handwritten signature in black ink, appearing to read "J B Coffey", is written over a horizontal line.