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December 19, 2001

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

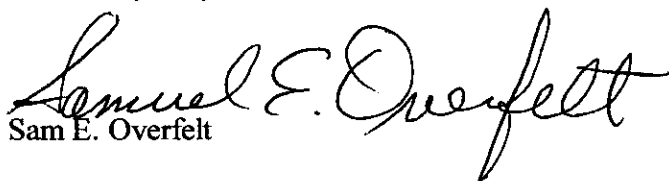
FILED²
DEC 20 2001
Missouri Public
Service Commission

RE: Staff Complaint of Union Electric Rates, Case No. EC-2002-1

Dear Mr. Roberts:

On behalf of the Missouri Retailers Association, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Motion for Reconsideration and Clarification of the Commission's December 7, 2001 Order.

Yours very truly,


Sam E. Overfelt

SEO:wn

cc: All Parties of Record

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
DEC 20 2001
Missouri Public
Service Commission

Staff of the Missouri Public Service Commission)
)
)
Complainant)
)
v.)
)
Union Electric Company, d/b/a)
AmerenUE,)
)
Respondent.)

Case No. EC-2002-1

MISSOURI RETAILERS ASSOCIATION MOTION FOR RECONSIDERATION
AND CLARIFICATION OF COMMISSION'S
ORDER ESTABLISHING TEST YEAR AND PROCEDURAL SCHEDULE

COMES NOW the Missouri Retailers Association ("MRA"), and for its Motion for Reconsideration or Clarification states as follows:

1. On December 7, 2001, the Public Service Commission ("Commission") issued its Order establishing adoption of a July 30, 2001 test year and setting a procedural schedule ("Order").
2. On December 11, 2001, the Staff of the Missouri Public Service Commission ("Staff") and the Office of Public Counsel ("Public Counsel") filed motions for reconsideration of said Order.
3. The MRA seeks reconsideration of the portion of the Order that requires intervenors to file rebuttal testimony on December 20, 2001. It is impossible for the MRA to meet the testimony filing date of December 20, 2001 set by the Commission in its Order using a July 30, 2001 test year. Intervenor testimony should be filed after that of AmerenUE

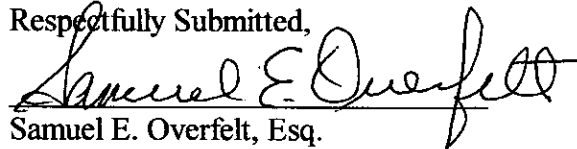
("Company"), in order to have its testimony based on all of the positions presented in the case by the named parties, not just a portion of the named parties. The MRA's position will be more closely aligned with Staff and Public Counsel historically on revenue issues.

4. MRA would suggest that because of the complexity of the filing schedule for all intervenors that an additional prehearing conference would be appropriate.

5. The MRA agrees with the Missouri Energy Group and with the Staff and Public Counsel, that if the Company accepts the Commission's assertion that it has agreed to a rate retroactive to April 1, 2002, the Company be required to file a tariff to that effect or otherwise commit in a manner binding on the Company.

WHEREFORE, the MRA respectfully requests that the Commission set a later date for the filing of rebuttal testimony and clarify its order requiring the Company to file a tariff making changes in rates resulting from this case retroactive to April 1, 2002.

Respectfully Submitted,



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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 day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EC-2002-1

Dated at Jefferson City, Missouri this 19th of December 2001:

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