One Ameren Plaza 1901 Chouteau Avenue PO Box 66149 St. Louis, MO 63166-6149 314.621.3222

314.554.2237 314.554.4014 (fax) JJCOOK@AMEREN.COM

June 24, 2002

### **VIA HAND DELIVERY**



Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65101

Re: MPSC Case No. EC-2002-1

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 **Notice of Intent to Submit Depositions**.

Very truly yours,

Jámes J. Cook

Managing Associate General Counsel

JJC/vww

**Enclosures** 

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Staff of the Missouri Public	)	
Service Commission	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. EC-2002-1
	)	
Union Electric Company, d/b/a	)	
AmerenUE,	)	
	)	
Respondent.	)	

#### NOTICE OF INTENT TO SUBMIT DEPOSITIONS

COMES NOW Union Electric Company d/b/a AmerenUE ("The Company" or "UE") and hereby notifies the Commission of its intent to file Deposition Transcripts relative to Case No. EC-2002-1.

- 1. On June 18, 2002, The Missouri Public Service Commission ("the Commission") issued, a Notice Regarding Hearing Schedule, and Objections to Depositions and Testimony ("Notice"). Included in the Notice was the Commission's instructions and deadlines for parties wishing to have depositions admitted at the hearings.
- 2. Pursuant to that Notice, the Company hereby notifies the parties of its intent to offer the following depositions into evidence at the hearing in this case:

Witness Name	Date of Deposition
Alan J. Bax	11/28/01
Alan J. Bax	04/24/02

Witness Name	Date of Deposition
Leon Bender	11/19/01
Leon Bender	04/19/02
Ronald L. Bible	11/12/01
Ronald L. Bible	04/16/02
Mark Burdette	06/20/02
John P. Cassidy	11/28/01
John P. Cassidy	04/11/02
Doyle Gibbs	11/27/01
Doyle Gibbs (as Mark D. Griggs)	11/29/01
Doyle Gibbs	04/12/02
Paul R. Harrison	11/27/01
Paul R. Harrison	04/11/02
Hong Hu	06/19/02
Lena Mantle	11/20/01
Lena Mantle	04/17/02
Jolie Mathis	11/27/01
Jolie Mathis	04/09/02
Gregory R. Meyer	11/24/01
Gregory R. Meyer	04/24/02
Janice Pyatte	11/28/01
Janice Pyatte	04/18/02
Stephen Rackers	11/20/01
Stephen Rackers	04/17/02
Ted Robertson	06/27/02
J. Selecky	06/25/02
Leasha S. Teel	11/19/01
Leasha S. Teel	04/18/02
James C. Watkins	11/30/01
James C. Watkins	04/18/02

- 3. Additionally, should the Company take other witness depositions prior to his/her appearance at the hearings in this case, these depositions too will be submitted to the Commission.
- 4. Although the Company may forgo cross-examination of some of these witnesses, it reserves the right to cross-examine all witnesses. It is the Company's expectation that the admission of the depositions will significantly shorten the cross-examination process.

WHEREFORE, for the aforementioned reasons, UE hereby submits its Notice of Intent to Submit Depositions.

Respectfully submitted,

UNION ELECTRIC COMPANY

d/b/a AmerenUE

By:

James J. Cook, MBE #22697

Managing Associate General Counsel

Thomas M. Byrne, MBE #33340

Associate General Counsel

Steven R. Sullivan, MBE #33102 Vice President, General Counsel

& Secretary

One Ameren Plaza
1901 Chouteau Avenue
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
jjcook@ameren.com
314-554-2237
tbyrne@ameren.com
314-554-2514
srsullivan@ameren.com
314-554-2098
314-554-4014(fax)

## OF COUNSEL:

Robert J. Cynkar Victor J. Wolski Gordon D. Todd Cooper & Kirk, PLLC 1500 K Street, N.W. Suite 200 Washington, D.C. 20005 202-220-9600 202-220-9601 (fax)

DATED: June 24, 2002

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via hand delivery, fax or e-mail on this 24th day of June, 2002, on the following parties of record:

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65101

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

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

Office of the Public Counsel Governor Office Building 200 Madison Street, Suite 650 Jefferson City, MO 65101

R. Larry Sherwin Assistant Vice President Regulatory Administration Laclede Gas Company 720 Olive Street, Room 1415 St. Louis, MO 63101

Ronald Molteni Assistant Attorney General Supreme Court Building 221 West High Street P.O. Box 899 Jefferson City, MO 65102 John B. Coffman Deputy Public Counsel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Robert C. Johnson, Esq. Lisa C. Langeneckert, Esq. Law Office of Robert C. Johnson 720 Olive Street, Suite 2400 St. Louis, MO 63101

Diana M. Vuylsteke Bryan Cave LLP One Metropolitan Square 211 North Broadway, Ste. 3600 St. Louis, MO 63102-2750

Robin E. Fulton
Schnapp, Fulton, Fall, Silver &
Reid, L.L.C.
135 East Main Street
P.O. Box 151
Fredericktown, MO 63645

Michael C. Pendergast
Assistant Vice President &
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101

Tim Rush Kansas City Power & Light Company 1201 Walnut Kansas City, MO 64141 James M. Fischer Fischer & Dority, P.C. 101 Madison, Suite 400 Jefferson City, MO 65101 Samuel E. Overfelt, Esq. Law Office of Samuel E. Overfelt 618 East Capitol Avenue P.O. Box 1336 Jefferson City, MO 65102

James J. Cook