

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

In the Matter of the Application of)	
Union Electric Company d/b/a AmerenUE)	
for an Order Authorizing the Sale and)	Case No. EO-2010-0263
Transfer of Certain Assets of AmerenUE)	
to St. James Municipal Utilities)	
and Rolla Municipal Utilities.)	

ROLLA AND ST. JAMES' REPLY TO SHOW CAUSE RESPONSE

Come now the City of Rolla, Missouri (Rolla), by and through Rolla Municipal Utilities, and the City of St. James (St. James), by and through St. James Municipal Utilities, and, in reply to the Response to Show Cause and Request for Special Counsel filed by Donna D. Hawley (Ms. Hawley), respectfully state as follows to the Missouri Public Service Commission (Commission):

1. On August 27, 2010, the Commission issued its Order to Show Cause wherein it directed Ms. Hawley to “show cause why she should not be subject to sanctions by the Commission” for failure to comply with the Commission’s July 30 Order Setting Procedural Schedule, and failure to seek leave of the Commission to late-file the required information. The Order Setting Procedural Schedule, among other things, required the parties to file certain information by August 25, 2010.

2. In response, on August 30, 2010, Ms. Hawley filed a document entitled “Response to Show Cause and Request for Special Counsel,” which she has identified as highly confidential. It is questionable whether the document qualifies for HC status in its entirety, if at all, and no public version was filed.

3. Initially, Rolla and St. James would note that, whatever her stated reasons for not complying with the Commission order, as of yet, Ms. Hawley has still failed to

provide the information required by the Commission's July 30 order. Rolla and St. James also state that they are unequivocally opposed to any extension of the procedural schedule for the reasons they have stated previously to the Commission.

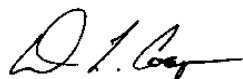
4. Additionally, while Ms. Hawley claims that she has had issues that prevented and, apparently, continue to prevent, her from complying with the Commission's order, on August 26, 2010, she was able to serve fifty-seven (57) new data requests on Rolla and St. James (See **Appendix A**). An overwhelming majority of these new data requests concern the R.W. Beck study, for which the Commission has already ruled not relevant to any issue before the Commission in this case. This would suggest that the issue for her is really one of priority.

5. As can be derived from the title of Ms. Hawley's pleading, she has requested the appointment of a "Special Counsel." Setting aside the logistical and administrative issues associated with such an appointment (which can more adequately be addressed by the Commission Staff), Rolla and St. James note that the issues Ms. Hawley wants the Special Counsel to address are beyond those jurisdictional issues described by the Commission in its Order Regarding Protective Order issued August 25, 2010. Accordingly, there is no reason to appoint a "Special Counsel" and no reason to provide an extension of the procedural deadlines previously established in this case.

WHEREFORE, Rolla and St. James pray that the Commission consider this reply, deny Ms. Hawley's request for special counsel and issue such further orders as it

believes to be reasonable and just.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on August 31, 2010, to the following:

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