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September 19, 2002

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

FILED⁴
SEP 19 2002

RE: Union Electric d/b/a AmerenUE
Case No. EO-2002-351

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **PUBLIC COUNSEL'S POSITION STATEMENT**. 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
Deputy Public Counsel

JBC:jb

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

FILED⁴
SEP 19 2002
Missouri Public
Service Commission

In the Matter of the Application of Union)
Electric Company for Permission and)
Authority to Construct, Operate, Own, and)
Maintain a 345 Kilovolt Transmission)
Line in Maries, Osage, and Pulaski)
Counties, Missouri ("Callaway-Franks)
Line").)

Case No. EO-2002-351

PUBLIC COUNSEL'S POSITION STATEMENT

Comes Now the Office of the Public Counsel (Public Counsel) and provides its
Position Statement as follows:

- 1. Is the Application of AmerenUE for permission and authority, that is, a certificate of convenience and necessity, to construct, own, operate and maintain a 345 kilovolt electric transmission line in Maries, Osage, and Pulaski Counties, Missouri in the public interest, and should it be granted, with or without conditions?**

Public Counsel: Additional transmission access will benefit the AmerenUE system, but the Commission should also attempt to minimize the impact that the Callaway-Franks Line would have on existing homes and farms. The Application would be in the public interest if, and only if, the Commission can impose reasonable and necessary conditions upon the construction, operation and maintenance of such a transmission line in this area. Such conditions should address the serious concerns raised by the Intervenor.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: _____

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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 19th day of September 2002:

JOSEPH H RAYBUCK Esq
Union Electric Company d/b/a AmerenUE
PO Box 66149
St Louis MO 63166-6149

GENERAL COUNSEL
Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102

JAMES B DEUTSCH
308 East High Street
Suite 301
Jefferson City MO 65101

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