Caldwell & Singleton, LLC

Worsham N. Caldwell** Richard N. Singleton, Jr.* Tara L. Morris † Annette E. Slack†† Attorneys and Counselors at Law 1601 Olive, First Floor St. Louis, Missouri 63103-2344 314-421-0077 Fax: 314-421-5377 E-Mail: chslaw@mindspring.com

Of Counsel: Freeman R. Bosley, Jr. LaRee M. DeFreece Daniel T. Friedson

Janet Holbrook, R.N.

*Also Licensed in Illinois

**Also Licensed in Virginia

+ Licensed in Illinois and Mis

† Licensed in Illinois and Mississippi †† Also a Registered Nurse

November 30, 2001

FILED
DEC 4 2001

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

Missouri Public Service Gammicalor

Re: MPSC Case No. EC-2002-112; Sterling Moody, et al., v. Ameren UE, et al.

Dear Mr. Roberts:

Enclosed for filing on behalf of Complainants Sterling Moody in the abovementioned action, please find an original and (8) copies of Complainants' Response to Respondent AmerenUE's Proposed Procedural Schedule.

Please acknowledge receipt of this request as soon as possible.

Sincerely,

Freeman R. Bosley, Jr.

FRB/krt Enclosures



OF THE STATE OF MISSOURI

Mi	SSC	ouri	Pui	olic
ervi	ce	Cor	ոտ	issi

Sterling Moody, Sterling's Market Place, And Sterling's Place, I)
Complainants,) Case No.: EC 2002-112
v.)
AmerenUE, Union Electric Co. d/b/a AmerenUE; and Mike Foy, Leroy Ettling, And Sherry Moshner, as employees of AmerenUE,))))
Respondents.	ý

COMPLAINANTS' RESPONSE TO RESPONDENT AMERENUE'S PROPOSED PROCEDURAL SCHEDULE

Come now Complainants Sterling Moody and Sterling's Market Place I and submit their response to Respondent AmerenUE's proposed procedural schedule:

- Complainants support Respondent AmerenUE's motion for an expedited hearing.
- 2. In response to Respondent AmerenUE's proposed procedural schedule, Complainants request that it be amended to reflect the following:

December 12, 2001 - Deposition of AmerenUE employee Leroy Ettling.

December 13, 2001 - Deposition of AmerenUE employee Mike Foy.

December 14, 2001 - Deposition of AmerenUE employee Sherry Moschner.

December 21, 2001 - Complainants file direct testimony.

January 11, 2002 - Rebuttal (all parties wishing to file, except Complainants).

January 21, 2002 - Surreebuttal (all parties examination to be filed)



February 15, 2002 - Position Statement (all parties) to be filed.

March 4, 2002 - Hearing.

WHEREFORE, Complainants respectfully request that the Commission issue its Order amending Respondents' Proposed Procedural Schedule and for such other and further relief the Commission deems just and proper.

Respectfully submitted,

CALDWELL & SINGLETON, LLC

Freeman R. Bosley, Jr., #29341 1601 Olive Street, First Floor

St. Louis, MO 63103-2344 (314) 421-0077

(314) 421-5377 Facsimile

Attorneys for Complainants Sterling Moody, Sterling's Market Place And Sterling's Market Place, I

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via U.S. first class mail on this 30th day of November, 2001 to all parties of record listed below.

CASE NO. EC-2002-112

Office of the Public Counsel P. O. Box 78 Jefferson City, MO 65102

James J. Cook AmerenUE 1901 Chouteau Avenue P. O. Box 66149 St. Louis, MO 63166-6149 General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Freeman R. Bosley, Jr.