

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE for Authority to File Tariffs Increasing)	Case No. ER-2010-0036
Rates for Electric Service Provided to Customers in)	
The Company's Missouri Service Area.)	

**RESPONSE TO THE OFFICE OF
PUBLIC COUNSEL'S REPLY OF MARCH 9, 2010**

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company) and, for its *Response to the Office of Public Counsel's Reply of March 9, 2010*, states as follows:

1. The Office of Public Counsel (OCP) filed its *Reply to Response to Motion to Compel AmerenUE to Respond to Data Requests* (OPC Reply) on March 9, 2010.

2. In paragraphs One and Five, OPC refers to a statement in the previous AmerenUE pleading as a "blatant lie" and "patently false accusation." This pleading only addresses that issue.

3. OPC is correct that AmerenUE's filing of March 8, 2010 contained a factual misstatement. OPC did have conversations with various individuals at AmerenUE about the data requests between December 28, 2009 and the beginning of March 2010, which the undersigned counsel overlooked. After reviewing the table contained on page four of the OPC Reply, it does appear to be a correct timeline of conversations. The first twelve words in paragraph three in AmerenUE's *Response to Motion to Compel AmerenUE to Respond to Data Requests* are incorrect and counsel apologizes for incorrectly reciting the facts to the Commission.

4. Although it is clear the undersigned counsel made a factual error, she takes issue with OPC's statement that she lied to the Commission. There was no illicit

motivation or desire to mislead the Commission on this issue. It was truly an error. That portion of the pleading has no bearing on the remainder of the pleading.

WHEREFORE, AmerenUE respectfully requests that the Commission issue an order rejecting the Office of the Public Counsel's Motion to Compel AmerenUE to Respond to Data Requests.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

/s/ Wendy Tatro

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 9th day of March, 2010.

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