

February 24, 2000

**VIA FEDERAL EXPRESS**



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

**FILED<sup>2</sup>**  
FEB 25 2000  
Missouri Public  
Service Commission

Re: MPSC Case No. EM-96-149

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 fourteen (14) copies of both its **Request to File Response** and its **Response to Staff Motion for Commission Order**.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script that reads "James J. Cook".

James J. Cook  
Managing Associate General Counsel

JJC/db  
Enclosures

cc: Ms. Shelly Register  
Parties on Attached Service List

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via Federal Express on this 24th day of February, 2000, on the following parties of record:

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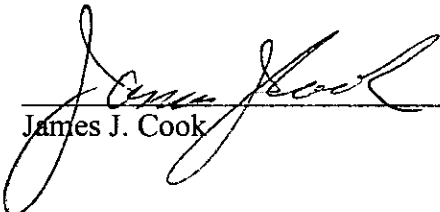
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James J. Cook

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

FEB 25 2000

Missouri Public  
Service Commission

In the Matter of the Application of Union Electric Company)  
for an Order Authorizing: (1) Certain Merger Transactions )  
Involving Union Electric Company; (2) the Transfer of )  
Certain Assets, Real Estate, Leased Property, Easements )  
and Contractual Agreements to Central Illinois Public )  
Service Company; and (3) In Connection Therewith, )  
Certain Other Related Transactions )

Case No. EM-96-149

REQUEST TO FILE RESPONSE

Comes now Union Electric Company ("Union Electric", "UE" or "the Company") and asks leave of the Commission to file its Response. On February 17, 2000, the Staff filed pleadings entitled Staff Motion For Commission Orders. On February 18, the Commission, through its Secretary and Chief Regulatory Law Judge, Dale Roberts, issued an order shortening the time to respond to the Staff's pleadings. A copy of that order was faxed to the Legal Department of Union Electric Company on that day. The order directed the parties to file responses by 4:00 p.m. Tuesday, February 22, 2000. Monday, February 21, 2000 was a holiday for the Company and the Commission.

The Company was able to prepare and file its response, but filed it in only one of the three dockets – EO-96-14. Work on the response continued through the early afternoon of February 22. The final version was sent to the Company's Jefferson City office via computer and the secretary there prepared the appropriate number of copies for the filing.

In order to make the deadline, there was insufficient time to prepare the same pleadings for the other two dockets, make the appropriate copies and complete the other filing details before the 4:00 p.m. deadline.

In a footnote to the Company's pleading in EO-96-14, the Company informed the Commission that it would be filing identical pleadings in the other two cases as soon as possible. This pleading now asks leave of the Commission to file the attached Responses in Case No. EO-96-15 and EM-96-149.

Dated: February 24, 2000

Respectfully submitted,

UNION ELECTRIC COMPANY

By: 

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