

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

In the Matter of an Investigation into an)	
Incident in December 2005 at the)	
Taum Sauk Pumped Storage Project)	Case No. ES-2007-0474
Owned and Operated by the)	
Union Electric Company d/b/a AmerenUE.)	

REQUEST FOR CLARIFICATION

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE) and for its request for clarification states as follows:

1. On June 19, 2007 the Missouri Public Service Commission (Commission) opened this case to investigate the Taum Sauk incident that occurred in December, 2005. On July 10, 2007 the Commission issued an order setting a hearing in this matter at 1:30 p.m. on Tuesday, July 24, 2007. The order simply states: "Interested parties should provide witnesses to testify and answer Commissioner questions. In addition, interested parties shall have a legal representative attend so Commissioners may ask them legal questions."

2. The Commission has issued subpoenas for 12 witnesses, and the Staff has submitted 34 data requests to AmerenUE. AmerenUE has accepted service of the subpoenas for the 11 witnesses who are current employees of AmerenUE and is working to gather responses to the data requests. AmerenUE hopes to have responses to all the data requests submitted to the Staff prior to the July 24, 2007 hearing date.

3. AmerenUE is submitting this pleading to request additional clarification on (a) the procedures that the Commission intends to follow at the hearing; (b) the aspects of the Taum Sauk incident that the Commission intends to investigate; and (c) the questions the Commission

will ask AmerenUE to answer. AmerenUE is seeking this clarification so that it can be appropriately prepared to respond to the Commission's questions.

4. With regard to procedural issues, AmerenUE seeks the following clarification:
 - a. Will the Commission afford AmerenUE and any other participating parties the opportunity for brief opening and/or closing statements?
 - b. Will parties be afforded the opportunity to ask questions of witnesses, or will questions only be asked by Commissioners?
 - c. Will witnesses be scheduled to appear in any particular order?
 - d. Does the Commission anticipate any witnesses other than the 12 noted above?

5. With regard to the aspects of the Taum Sauk incident that are the subject of the investigation, AmerenUE understands from recent Commission agenda meetings that the primary concern of the Commission is the movement of the probes. AmerenUE requests that the Commission provide clarification regarding any other issues that it anticipates addressing during the hearing. Without time to prepare, it will very difficult, if not impossible, for AmerenUE to address unanticipated issues during the hearing.

WHEREFORE, AmerenUE respectfully requests that the Commission provide clarification as requested herein, so that it and its employees may be fully prepared to address the issues in the hearing scheduled for this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

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Dated: July 18, 2007

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via electronic filing with the Missouri Public Service Commission and via electronic mail (e-mail) on this 18th day of July, 2007, to:

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