

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN

312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 634-7431
E-MAIL: WREBSE@AOL.COM

CHARLES E. SMARR
DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
RACHEL M. CRAIG
BRIAN T. MCCARTNEY
DALE T. SMITH

August 2, 1999

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

FILED

AUG 2 1999

Missouri Public
Service Commission

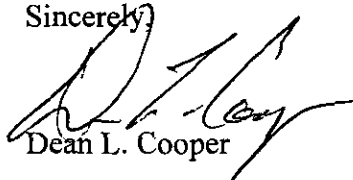
Re: Case No. EX-99-442

Dear Mr. Roberts:

Enclosed for filing with the Commission on behalf of Union Electric Company d/b/a AmerenUE, please find an original and fourteen (14) copies of the Satisfaction of Outstanding Data Requests.

Please see that this filing is brought to the attention of the appropriate Commission personnel. If there are any questions regarding this filing, please feel free to give me a call at your convenience. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



Dean L. Cooper

DLC/da
Enclosure

cc: Office of Public Counsel
Mr. Keith Thornburg

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

FILED

AUG 2 1999

Missouri Public
Service Commission

In the matter of 4 CSR 240-40.016)	
Proposed Rule, Gas Affiliate)	Case No. GX-99-444
Transaction Rules)	Case No. GX-99-445
In the matter of 4 CSR 240-40.015)	
Proposed Rule, Electric Affiliate)	Case No. EX-99-442
Transaction Rules)	

**SATISFACTION OF OUTSTANDING
DATA REQUESTS**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), and states the following to the Missouri Public Service Commission ("Commission") in order to supplement its prior data request responses and to satisfy the outstanding data requests in the above-referenced matters:

BACKGROUND

1. On or about June 4, 1999, the Office of the Public Counsel (the "OPC") served data requests upon AmerenUE in Commission Case Nos. GX-99-444, GX-99-445 and EX-99-442. While separate sets of data requests were served in each of the listed cases, certain of the requests were identical in content.

2. Although the applicability of the data request process in the context of a rulemaking proceeding is somewhat doubtful, AmerenUE voluntarily provided much of the information requested by the OPC in the form of written responses and documents in the interest of furthering the rulemaking process. However, three data requests remained at issue.

3. Data Request No. 507 in Cases No. GX-99-444, GX-99-445 and EX-99-442 ("DR 507") provides as follows:

Please provide a copy of the Company's two most recent strategic plans (business

plans) for its (1) overall regulated and (2) overall non-regulated electric operations. If the Company does not possess or have access to some of the documents within the scope of those requested in this DR, please identify which of the requested documents that the Company does not possess or have access to.¹

(Emphasis added).

4. Data Request No. 508 in Cases No. GX-99-444 and GX-99-445 ("DR 508")

provides as follows:

Please provide a copy of the Company's most recent strategic plans (business plans) for the Company's gas marketing affiliate. If the Company does not have a gas marketing affiliate, please provide a statement to that effect.

(Emphasis added).

5. Data Request No. 509 in Cases No. GX-99-444 and GX-99-445 (Designated No. 508 in Case No. EX-99-442) ("DR 509") provides as follows:

Please provide a copy of the Company's most recent strategic plans (business plans) for each of its unregulated business units and affiliates. If the Company does not possess or have access to documents within the scope of those requested in this DR, please provide a statement to that effect.²

(Emphasis added).

6. AmerenUE served objections to certain data requests, including DR's 507, 508 and 509, on counsel for the OPC.

7. On or about July 9, 1999, the OPC filed a Motion to Compel responses to certain

¹ The following sentence is added to the request issued in Cases No. GX-99-444 and GX-99-445: "If the Company's response to OPC DR No. 508 in EX-99-442 contained documents that are responsive to this DR, please reference the specific documents in that response that are responsive to this DR but do not provide additional copies."

² The following sentence is added to the request issued in Cases No. GX-99-444 and GX-99-445: "If the Company's response to OPC DR No. 508 in EX-99-442 contained documents that are responsive to this DR, please reference the specific documents in that response that are responsive to this DR but do not provide additional copies."

data requests, including DR's 507, 508 and 509, in all three cases. On or about July 19, 1999, AmerenUE filed its Response to Motion to Compel in all three cases. As of this date, the Commission has not ruled on the motions to compel.

VOLUNTARY RESPONSES

8. After further review of the data requests and its prior responses, AmerenUE has reconsidered its positions and has determined to respond to the data requests as written without requiring the Commission to address the issues raised by the OPC's motions to compel and AmerenUE's responses. This action is taken without waiving the positions taken in AmerenUE's prior pleadings and in the interest of resolving this dispute in an amicable fashion.

9. The data requests served upon AmerenUE (the regulated subsidiary in the Ameren family) request various types of information for "the Company" or AmerenUE. AmerenUE is one of approximately thirty-two (32) direct or indirect subsidiaries of Ameren Corporation. Of the Ameren Corporation subsidiaries, only AmerenUE is a Missouri public utility as defined in section 386.020, RSMo. (Supp. 1998), and generally subject to the jurisdiction of the Missouri Public Service Commission.

10. AmerenUE therefore supplements its previous responses to the data requests as follows:

DR 507 - AmerenUE has no such strategic plans (business plans) for its overall non-regulated electric operations. AmerenUE previously responded with regard to plans for its overall regulated operations;

DR 508 - AmerenUE has no such strategic plans (business plans) for a gas marketing affiliate;

DR 509 - AmerenUE has no such strategic plans (business plans) for unregulated

business units and affiliates.

MOTIONS TO COMPEL ARE MOOT

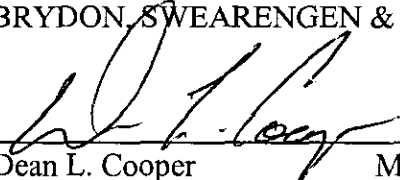
11. The supplemental responses complete AmerenUE's responses to the OPC data requests. Thus, there is no longer a discovery issue and the OPC's motions to compel are moot.

WHEREFORE, AmerenUE respectfully requests that the Commission dismiss the motions to compel as moot and grant such further relief as it shall find appropriate under the circumstances.

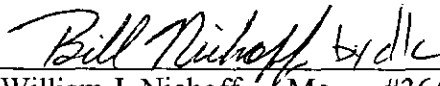
Respectfully Submitted,

BRYDON SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper Mo #36592
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102
Telephone: (573) 635-7166
Facsimile: (573) 635-0427

and


William J. Niehoff Mo #36448
James J. Cook Mo. #22697
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, Missouri 63166-6149
Telephone: (314) 554-2514
Facsimile: (314) 554-4014

Attorneys for Union Electric Company

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above pleading has been served on the Office of the Public Counsel and the Staff of the Missouri Public Service Commission by facsimile, hand-delivery, or U.S. Mail, first class, this 2nd day of August, 1999.



A handwritten signature, appearing to read "D. T. Long", is written over a horizontal line.