

April 24, 2002

VIA FEDERAL EXPRESS



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

Re: MPSC Case No. EC-2002-1025

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 eight (8) copies of its **Response To Motion To Consolidate Instant Complaint Case With Related Proceeding Respecting The Third And Final Year Of The Second UE Experimental Alternative Regulation Plan.**

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 dark ink, appearing to read "James J. Cook", is written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/vww

Enclosures

15877

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

The Staff of the Missouri Public)	
Service Commission,)	
)	
Complainant,)	
)	
)	
v.)	Case No. EC-2002-1025
)	
)	
Union Electric Company, d.b.a.)	
AmerenUE)	
)	
Respondent.)	

**RESPONSE TO STAFF'S MOTION TO CONSOLIDATE INSTANT
COMPLAINT CASE WITH RELATED PROCEEDING RESPECTING THE
THIRD AND FINAL YEAR OF THE SECOND UE EXPERIMENTAL
ALTERNATIVE REGULATION PLAN**

COMES NOW Union Electric Company, d/b/a AmerenUE ("the Company") and in response to the Staff's filing of April 15, 2002 wherein Staff requests that the two matters concerning the "6th Sharing Period" be consolidated.

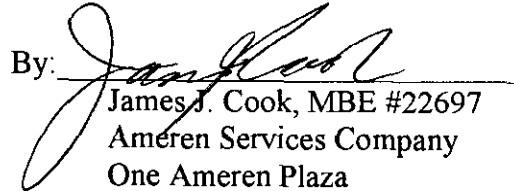
The Company has no objection to the consolidation of these two matters. While the Company does not agree that the new Complaint Case (EC-2002-1025) has any merit, should the Commission issue a Notice in that matter, the consolidation of this matter with the Staff's other filing is appropriate.

WHEREFORE, the Company has no objection to the request to consolidate.

Respectfully submitted,

UNION ELECTRIC COMPANY

By:



James J. Cook, MBE #22697
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2237
(314) 554-4014

DATED: April 24, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via Federal Express or U.S. Mail on this 24th day of April, 2002, on the following parties of record:

John B. Coffman
Office of the Public Counsel
P. O. Box 7800
Jefferson City, MO 65102

Diana M. Vulysteke
Bryan Cave LLP
One Metropolitan Square
211 North Broadway, Ste. 3600
St. Louis, MO 63102-2750

Steve Dottheim
Office of the General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65101

Ronald Molteni
Office of the Attorney General
221 W. High Street, P.O. 899
Jefferson City, MO 65101

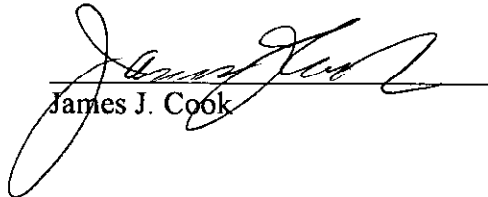
Robert C. Johnson/Lisa Langeneckert
Peper, Martin, Jensen, Maichel & Hetlage
720 Olive Street, 24th Floor
St. Louis, MO 63101

Robin E. Fulton/R. Scott Reid
Schnapp, Fulton, Fall, McNamara
& Silvey L.L.C.
135 E. Main Street, Box 151
Fredericktown, MO 63645-0151

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101

Gary W. Duffy/James Swearengen
Brydon, Swearengen & England PC
312 E. Capitol Ave., P.O. Box 456
Jefferson City, MO 65102

Paul H. Gardner
Goller, Gardner & Feather
131 East High Street
Jefferson City, MO 65101


James J. Cook