



Missouri Public Service Commission

Commissioners

SHEILA LUMPE
Chair

M. DIANNE DRAINER
Vice Chair

CONNIE MURRAY

ROBERT G. SCHEMENAUER

KELVIN L. SIMMONS

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

October 30, 2000

BRIAN D. KINKADE
Executive Director
GORDON L. PERSINGER
Director, Research and Public Affairs
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLLIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

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

FILED²
OCT 30 2000
Missouri Public
Service Commission

RE: Case No. EM-96-149 – 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.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF RESPONSE TO COMMISSION ORDER DIRECTING FILING.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Steven Dottheim
Deputy General Counsel
(573) 751-7489
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

OCT 30 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

STAFF RESPONSE TO COMMISSION ORDER DIRECTING FILING

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the Missouri Public Service Commission (Commission) Order Directing Filing issued October 27, 2000 wherein the Commission directed the Staff to file a copy of documents containing the written objections of AmerenUE to Staff Data Requests. In response thereto, the Staff states as follows:

1. Attached hereto are seven (7) letters from Union Electric Company (UE), d/b/a AmerenUE objecting to Staff Data Requests. The letters are dated as follows and object to the following Staff Data Requests:

<u>DATE OF UE LETTER</u>	<u>STAFF DATA REQUESTS OBJECTED TO BY UE</u>
October 3, 2000	13, 16-21, 23, 25-26, 29, 35, 40, 59, 61-72, 74-76, 4114
October 5, 2000	13, 16-21, 23, 25-26, 29, 35, 40, 59, 61-72, 74-77, 4114
October 9, 2000	78R
October 12, 2000	74R
October 12, 2000	80R
October 19, 2000	50R, 55R, 82R-87R
October 26, 2000	88R-107R

2. The Staff received on October 27, 2000 UE's most recent letter objecting to Staff Data Requests. This letter objects to Staff Data Request Nos. 88R-107R. As a consequence of the date of the receipt of this letter, the Staff's Motion To Compel filed on October 25, 2000 did not address UE's objections to Staff Data Request Nos. 88R-107R. In addition to the above-identified UE letters objecting to Staff Data Requests, attached are copies of Staff Data Request Nos. 88R-107R. The Staff seeks by this filing to include in its October 25, 2000 Motion To Compel, Staff Data Request Nos. 88R-107R.

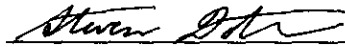
3. UE's objecting to Staff Data Requests has not caused the Staff from continuing to submit to UE additional Staff Data Requests seeking information for the Staff's audit of UE for purposes of the Staff's February 1, 2001 Section 7.g. second experimental alternative regulation plan (EARP) filing with the Commission. Based on the Commission's October 27, 2000 Order Directing Filing, the Staff will file with the Commission all subsequently received documents containing UE's written objections and copies of the Staff Data Requests to which objections are being made by UE.

4. The Staff did not submit with its October 25, 2000 Motion To Compel the letters containing UE's objections to Staff Data Requests because of certain content in UE's letter of October 3, 2000. In quoting at length from this letter in the Staff's October 25, 2000 Motion To Compel, the Staff indicated the deletion of this content by the use of an ellipsis. Staff counsel is in receipt of a letter by facsimile transmission from counsel for UE (a copy of which is attached hereto) requesting that certain sentences not quoted in the Staff's October 25, 2000 Motion To Compel be redacted from the copies of that letter to be filed this date, as not directly relating to UE's objection to the Staff's Data Requests and as constituting privileged communications. Pursuant to UE's request, the sentences in question have been redacted from the copies of the October 3, 2000 letter which are attached to the copies of the instant Staff Response being filed

this date. The copies of all other letters from UE that have been received to date by the Staff, which object to Staff Data Requests, are attached hereto and contain no redactions.

Wherefore the Staff submits this reply, including attachments, in response to the Commission's October 27, 2000 Order Directing Filing.

Respectfully submitted,
DANA K. JOYCE
General Counsel

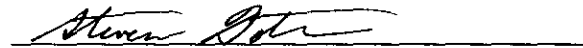


Steven Dottheim
Chief Deputy General Counsel
Missouri Bar No. 29149

Attorney for the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 30th day of October 2000.



Ameren Services

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

314.554.2237
314.554.4014 (fax)
JJCOOK@AMEREN.COM

October 30, 2000

VIA FACSIMILE

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



Re: MPSC Case No. EM-96-149

Dear Mr. Dottheim:

I have reviewed the Commission's Order Directing Filing, in EM-96-149, issued on October 27, 2000. That Order directs the Staff to file my letter to you, dated October 3, 2000, as well as later "documents containing the written objections of AmerenUE."

In your Motion to Compel, you accurately quoted from my October 3, 2000 letter to you concerning our objection to the Staff's initiation of a cost of service audit. You accurately quoted the entirety of that letter, except for the final few sentences, which were properly omitted from your pleading, as they were communication between counsel, not directly related to the objection. I ask that you redact that portion of the October 3, 2000 letter as constituting privileged communications, prior to its submission to the Commission.

Concerning the later communications, which contained our objections to specific data requests, I have no objection to the submission of those letters, in their entirety.

Very truly yours,

A handwritten signature in black ink, appearing to read "James J. Cook", written over a printed name and title.

James J. Cook
Managing Associate General Counsel

JJC/mlh

a subsidiary of Ameren Corporation

October 3, 2000

Mr. Steven R. Dottheim
Chief Deputy General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101



Dear Steve:

In recent weeks, we have received data requests from the Staff, which are unrelated to (and certainly unauthorized by) any proceeding under the EARP.¹ Indeed, these data requests are of a kind that would be appropriate only in a rate reduction proceeding, but appear quite foreign in the EARP context. Moreover, we have been advised that representatives of the Staff plan to remain on site for several months, for what appears to be the kind of audit-like work that might be appropriate in a rate reduction proceeding, but certainly has no place in the EARP.

As you know, the EARP expressly provides that "Staff, OPC and other signatories may not file, encourage or assist others to file a rate reduction case through June 30, 2001," unless certain special conditions occur, which they have not. *See* EARP, § 7 (c). Thus, the signatories were very clear that rate reduction proceedings, including the various forms of discovery that make up much of those proceedings, were not to begin before the conclusion of the EARP.

The procedure for filing "recommendations" with the Commission concerning whether the EARP should be continued and under what terms, § 7 (g), equally clearly does not contradict the limitations of § 7(c) by somehow creating a rate reduction proceeding by another name. It is true that § 7 (g) invites the parties to suggest changes they believe to be appropriate, "including new rates, if recommended." This simple parenthetical reference to "new rates" allows the signatories flexibility: we can propose anything ranging from a specific new rate (based on any reasoning the individual

¹ As of this writing, these data requests are No. 13, Nos. 16-21, No. 23, No. 25-26, No. 29, No. 35, No. 40, No. 59, Nos. 61-72, Nos. 74-76 and No. 4114.
13147

Mr. Steven R. Dottheim

Page 2

October 3, 2000

signatory believes is persuasive) down to a simple conclusion that the rate needs to be changed without specifying what that rate should be. It does not, however, supersede the moratorium contained in § 7(c).

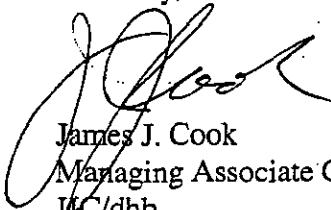
The fact that the reference to "new rates" does not import a traditional ratemaking procedure into the EARP is further confirmed by the fact that these recommendations are part of the process by which the Commission can evaluate what, after all, has been an experiment. The Commission cannot independently take any affirmative action based on these recommendations. It is well-established in Missouri law that the Commission cannot mandate an earnings sharing mechanism like that embodied in the EARP. Thus, the Commission could not order a new EARP based on these recommendations. Such recommendations can become provisions in a new EARP only by agreement of the signatories, followed by approval of the Commission.

Section 7(g) does not specifically provide for any mechanism of information disclosure to inform a signatory's analysis of the EARP. However, the EARP itself generally provides for the disclosure of a wealth of information that includes all that the signatories believed was needed to fulfill all responsibilities under the EARP, including the duty to make the recommendation required in § 7(g). *See* EARP, § 7(e). Again, nothing in these provisions of the EARP remotely suggests that any party is entitled to use the broader, far more burdensome, discovery techniques so common in a full-fledged ratemaking. What is particularly striking is that some of the Data Requests that are of concern have little to do with rates in any event.

In sum, because we believe the discovery strategy being pursued by the Staff is unauthorized by § 7(g), or anything else in the EARP – indeed, is wholly at odds with its premises -- we cannot acquiesce in this strategy. We remain open to discussing this problem with you, particularly if you can show some basis under the EARP for these data requests or the on-site work you contemplate.

I look forward to hearing your thoughts on this matter.

Sincerely,



James J. Cook
Managing Associate General Counsel
JJC/dhb

October 5, 2000

VIA FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

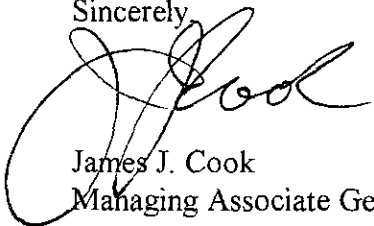
Re: Case No. EM-96-149
Review of EARP II

Dear Mr. Dottheim:

AmerenUE hereby objects to Data Request Nos. 13, 16-21, 23, 25-26, 29, 35, 40, 59, 61-72, 74-77 and 4114 in the above matter on the grounds that they are part of a discovery process that is not mandated or contemplated by the EARP. Specifically, such data requests are not expressly authorized by any provision of the EARP and are outside the scope of any provision of the EARP that arguably authorizes data requests. For example, the provision of the EARP for filing recommendations with the Commission concerning the continuation of the EARP, that is, Section 7(g), does not provide for any mechanism of information disclosure beyond the monitoring disclosures mandated in Section 7(e). Furthermore, these data requests ask for information outside of those monitoring provisions.

If you have any questions, please call.

Sincerely,



James J. Cook
Managing Associate General Counsel

Enclosure

October 9, 2000

VIA FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. EM-96-149
Review of EARP II

Dear Mr. Dottheim:

AmerenUE hereby objects to Data Request No. 78R in the above matter on the grounds that it is part of a discovery process that is not mandated or contemplated by the EARP. Specifically, such a data request is not expressly authorized by any provision of the EARP and is outside the scope of any provision of the EARP that arguably authorizes data requests. For example, the provision of the EARP for filing recommendations with the Commission concerning the continuation of the EARP, that is, Section 7(g), does not provide for any mechanism of information disclosure beyond the monitoring disclosures mandated in Section 7(e). Furthermore, this data request asks for information outside of those monitoring provisions.

If you have any questions, please call.

Sincerely,


James J. Cook
Managing Associate General Counsel

Enclosure

RECEIVED
OCT 10 2000

COMMISSION COUNCIL
PUBLIC SERVICE COMMISSION

October 12, 2000

VIA FACSIMILE & FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

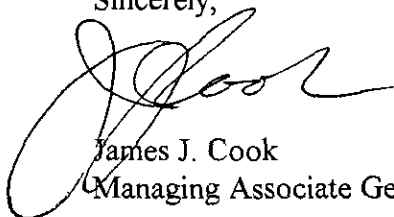
Re: Case No. EM-96-149
Review of EARP II
Additional Objection to Data Request No. 74R

Dear Mr. Dottheim:

AmerenUE hereby submits an additional objection to Data Request No. 74R in the above matter. Without waiving its previously submitted overall general objection to this data request, AmerenUE further objects to Data Request No. 74R on the grounds that this request is vague, overly broad and unduly burdensome. It fails to specify any given time frame for the information requested. Moreover, the request to describe "all actions ... undertaken to improve plant efficiency ..." is also too vague and overly broad, thereby asking the Company to expend many manhours to produce a response containing volumes and volumes of information which would not lead to the discovery of relevant, admissible evidence.

If you have any questions, please call.

Sincerely,



James J. Cook
Managing Associate General Counsel

Enclosure

RECEIVED
OCT 13 2000

COMMISSION OF
PUBLIC SERVICE COMMISSION

October 12, 2000

VIA FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

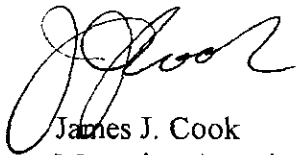
Re: Case No. EM-96-149
Review of EARP II

Dear Mr. Dottheim:

AmerenUE hereby objects to Data Request No. 80R in the above matter on the grounds that it is part of a discovery process that is not mandated or contemplated by the EARP. Specifically, such a data request is not expressly authorized by any provision of the EARP and is outside the scope of any provision of the EARP that arguably authorizes data requests. For example, the provision of the EARP for filing recommendations with the Commission concerning the continuation of the EARP, that is, Section 7(g), does not provide for any mechanism of information disclosure beyond the monitoring disclosures mandated in Section 7(e).

If you have any questions, please call.

Sincerely,



James J. Cook
Managing Associate General Counsel

Enclosure

RECEIVED
OCT 13 2000

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION

October 19, 2000

VIA FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. EM-96-149
Review of EARP II

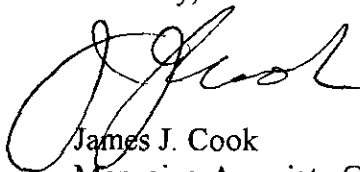
Dear Mr. Dottheim:

AmerenUE hereby objects to Data Request Nos. 50R, 55R, 82R, 83R, 84R, 85R, 86R and 87R in the above matter on the grounds that they are part of a discovery process that is not mandated or contemplated by the EARP. Specifically, such data requests are not expressly authorized by any provision of the EARP and are outside the scope of any provision of the EARP that arguably authorizes data requests. For example, the provision of the EARP for filing recommendations with the Commission concerning the continuation of the EARP, that is, Section 7(g), does not provide for any mechanism of information disclosure beyond the monitoring disclosures mandated in Section 7(e). Furthermore, these data requests ask for information outside of those monitoring provisions.

In addition, as to Data Request No. 87R, AmerenUE further objects on the grounds that this request is vague, overly broad and unduly burdensome.

If you have any questions, please call.

Sincerely,



James J. Cook
Managing Associate General Counsel

Enclosure

RECEIVED

OCT 23 2000
-th

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION

October 26, 2000

VIA FEDERAL EXPRESS MAIL

Mr. Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

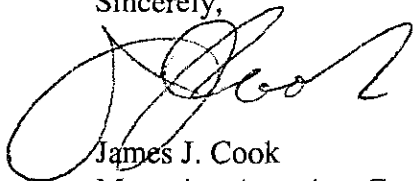
Re: Case No. EM-96-149
Review of EARP II

Dear Mr. Dottheim:

AmerenUE hereby objects to Data Request Nos. 88R, 89R, 90R, 91R, 92R, 93R, 94R, 95R, 96R, 97R, 98R, 99R, 100R, 101R, 102R, 103R, 104R, 105R, 106R and 107R in the above matter on the grounds that they are part of a discovery process that is not mandated or contemplated by the EARP. Specifically, such data requests are not expressly authorized by any provision of the EARP and are outside the scope of any provision of the EARP that arguably authorizes data requests. For example, the provision of the EARP for filing recommendations with the Commission concerning the continuation of the EARP, that is, Section 7(g), does not provide for any mechanism of information disclosure beyond the monitoring disclosures mandated in Section 7(e). Furthermore, these data requests ask for information outside of those monitoring provisions.

If you have any questions, please call.

Sincerely,



James J. Cook
Managing Associate General Counsel

Enclosure

RECEIVED
OCT 27 2000

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION



DATA INFORMATION REQUEST

Union Electric Company

CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/24/00

Information Requested:

Please provide queries, by month, with voucher numbers, and descriptions for FERC accounts 903, 905, 908, 909, 910, 912, 913, 916, 921, 923, 924, 925, 926, 930, and 931 for the test year ending June 30, 2000.

Requested By: Leasha Teel

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/24/00
Information Requested:

For Maj 330, Min 001, DV 54 & 52, Land Recreation, please identify what this land is used for and how it benefits the ratepayer.

Requested By: Paul Harrison

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/25/00
Information Requested:

Please provide the information requested for the following two questions.

A. Did Ameren UE receive any consideration, monetary or otherwise, from either CellNet Data Systems or Schlumberger RMS when Schlumberger RMS acquired CellNet Data Systems?

B. Does Ameren UE have any financial or other interest in Schlumberger RMS?

Requested By: Jim Russo

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:

Please provide the report "AMS nec200 12mtd0600.xls" by month for the 12 months ended 6/30/00 and update as available.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00

Information Requested:

1. Please provide staff with (a) Total Payroll (b) Capitalized Payroll (c) Payroll Taxes and (d) Benefits for each of the of the 12 months ending June 30,1998, June 30, 1999 and June 30, 2000.
2. Please provide an explanation of the Company's payroll capitalization policy.
3. Please explain the Company's payroll taxes and benefits capilization policy.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Please provide a copy of the budgeted pay raises for 1998, 1999 and 2000. Also, provide actual increase granted to date for 1999 and 2000. Have any limitations or restrictions on pay raises previously budgeted been initiated by the Company for 1999 through current?

If so, please provide documentation.

Requested By: Amanda McMellen

Information Provided: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

No. 94

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:

1. Does the Company expect any work force reduction in the future? If so, please explain. If work force increases are projected, please explain.
2. How far into the future has the Company projected its work force levels? Please provide on a monthly basis and explain.
3. Provide all studies and analysis the Company has performed regarding work force projection.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00

Information Requested:

Please provide the following for Union Electric Missouri Electric operations:

1. The total number of hours worked by month for employees that are paid overtime for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000. Update by month as available.
2. The total number of overtime hours by month for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000. Update by month as available.
3. The overtime payroll expense by month for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:

Please provide the following for seasonal or part-time employees for Union Electric Missouri electric operations:

1. The number of employees for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000.
2. The number of hours worked for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000.
3. The total pay for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Please provide the payroll distribution per FERC electric account for each of the 12 months ending June 30, 1998, June 30, 1999 and June 30, 2000.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:

1. Provide the 1999 and 2000 Illinois and Missouri unemployment tax rates and ceiling amounts for the Company.
2. Provide the 1999 and 2000 FUTA tax rates and ceiling amounts.
3. Please provide copies of the as filed unemployment reports for Illinois and Missouri for 1999 through current. Please update as additional filings are made.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested: See Attached

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

For Union Electric Missouri electric operations, please provide the following:

1. Provide a descriptive listing of all employee benefits that are in excess of base wages such as award programs, incentive plans, bonuses, care, insurance programs, etc. provided to any employee. Please specify those cases where a particular benefit is limited to a select employee or group of employees.
2. Provide a copy of all existing documentation describing the employee benefits. This documentation should include the criteria for receiving this additional compensation (who, when, amount and what each employee did receive the benefit. Also, indicate any situation where participation by the employee is voluntary.
3. For each particular benefit that was limited to a select employee or group of employees, provide the respective employee code, the corresponding employee name and position.
4. Provide the dollar amount and accounts to which each particular employee benefit identified above was recorded during the 12 months ending June 30, 2000. Please update this information on a continuing basis by month.

DATA INFORMATION REQUEST

Union Electric Company

CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Provide a listing of department codes that are associated with Payroll Ledger Detail report (for example, Customer Service -- 733).

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:

Regarding the Company's response to DR#99, please provide the amount paid to Ameren Services employees for each of the three plans in the test year and the amount allocated to electric operations.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Please provide the following information for Ameren Services:

- 1. Part-time and seasonal number of employees, hours worked, and total pay for 1997, 1998, 1999, and the 12 months ending 6/30/00.
- 2. Overtime hours worked and overtime expense for 1997, 1998, 1999, and the 12 months ending 6/30/00.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
 Union Electric Company
 CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Please provide the percent of total payroll charged to operations and maintenance and percent capitalized for each year from 1995-1999 and for the 12 months ending 6/30/00 for each of the following companies:

1. UE Missouri Electric Oerations
2. UE Total Company
3. Ameren Services

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

For Ameren Company, provide the total amounts of compensation paid for each member of the Board of Directors during the 12 months ending 6/30/00. Indicate the total amount of compensation that was allocated to Missouri electric and account(s) charged.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00
Information Requested:
For the Ameren Company:

1. List all individuals who serve as advisors to the Board of Directors.
2. For the 12 months ending 6/30/00, please provide the total compensation paid to each advisor.
3. For the 12 months ending 6/30/00, please provide the total compensation paid to advisors that was allocated to Missouri electric.
4. Indicate all Missouri electric accounts charged for advisor fees during the 12 months ending 6/30/00.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman
Date Requested: 10/26/00

Information Requested:

Regarding the Company's Performance Incentive Plan, which was discontinued in 1997, please identify how many of the six objectives were met in each year from 1993-1999.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST
Union Electric Company
CASE NO. EM-96-149

Requested From: Eileen Bauman

Date Requested: 10/26/00

Information Requested:

Has the Company ever experienced a year during which no payments were made under the Ameren Incentive Plan, Performance Incentive Plan or any of their predecessors? If so, please identify the years.

Requested By: Amanda McMellen

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EM-96-149 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Union Electric Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

**SERVICE LIST FOR
CASE NO. EM-96-149
October 30, 2000**

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

Richard S. Brownlee, III
Hendren and Andrae
P.O. Box 1069
Jefferson City, MO 65102

Gary W. Duffy/James Swearengen
Brydon, Swearengen & England P.C.
312 East. Capitol Ave.
P.O. Box 456
Jefferson City, MO 65102-0456

Diana M. Vulysteke
Bryan Cave LLP
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750

James M. Fischer
Attorney at Law
101 W. McCarty Street, Suite 215
Jefferson City, MO 65101

Paul S. DeFord
Lanthrop & Norquist, L.C.,
2345 Grand Blvd., Suite 2500
Kansas City, MO 64108

James J. Cook
William J. Niehoff
Union Electric Company
P.O. Box 149 (M/C 1310)
St. Louis, MO 63166

Ronald Molteni/Jeremiah Nixon
Office of the Attorney General
221 W. High Street, P.O. Box 899
Jefferson City, MO 65102

Charles Brent Stewart
Stewart & Keevil
1001 Cherry Street, Suite 302
Columbia, MO 65201

Marilyn S. Teitelbaum
Schuchat, Cook & Werner
1221 Locust Street, 2nd Floor
St. Louis, MO 63103-2364

Jim Berger
Local 309, IBEW
2000 Mall St. (Rte. 157)
Collinsville, IL 62234

Robert C. Johnson
720 Olive Street, 24th Floor
St. Louis, MO 63101

Michael C. Pendergast/Thomas Byrne
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101

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

William G. Riggins
Kansas City Power & Light Company
1201 Walnut Street
P. O. Box 418679
Kansas City, MO 64141-9679

Sam Overfelt
618 E. Capital Ave.,
P.O. Box 1336
Jefferson City, MO 65102

William A. Spencer
216 E. Capitol Ave., P.O. Box 717
Jefferson City, MO 65102

Michael Datillo
Local 1455, IBEW
5570 Fyler Ave.
St. Louis, MO 63139

John W. McKinney
Missouri Public Service
10700 E. 350 Hwy., PO Box 11739
Kansas City, MO 64138

Kenneth J. Neises
Laclede Gas Co.
720 Olive St., Rm. 1514
St. Louis, MO 63101

F. Jay Cummings
Southern Union Gas Co.
504 Lavaca, Ste. 800
Austin, TX 78701

Charles J. Fishman
Trigen-St. Louis Energy Corp.
One Ashley Place
St. Louis, MO 63102

Dave White
Local 2, IBEW
209 Flora Dr.
Jefferson City, MO 65101

Gary Roan
Local 702, IBEW
106 N. Monroe
West Frankfort, IL 62896

Robert B. Fancher
Empire District Electric Co.
602 Joplin, PO Box 127
Joplin, MO 64801

Joe Lakshmanan
Illinois Power Company
600 South 27th St., PO Box 511
Decatur, IL 62525

Paul Gardner
Goller & Associates
131 E. High St.
Jefferson City, MO 65102