

**FILED**<sup>3</sup>

SEP 21 2001

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September 20, 2001

Missouri Public  
Service Commission

**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-2002-112

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 **Request for Mediation**.

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 / dhb".

James J. Cook  
Managing Associate General Counsel

JJC:rd

Enclosures

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>

SEP 21 2001

Missouri Public  
Service Commission

Sterling Moody, Sterling's Market Place )  
And Sterling's Place, I )

Complainants, )

vs. )

Case No. EC-2002-112

AmerenUE, Union Electric Co. d/b/a )  
AmerenUE; and Mike Foy, Leroy Ettling, )  
And Sherry Moschner, as employees of )  
AmerenUE. )

Respondents. )

**UNION ELECTRIC COMPANY'S  
REQUEST FOR MEDIATION**

Union Electric Company, d/b/a AmerenUE and Mike Foy, Leroy Ettling, and Sherry Moschner as employees thereof ("Respondents") hereby submit its Request for Mediation in the immediate case, in accordance with instructions outlined in the Notice of Complaint dated September 4, 2001, from the Missouri Public Service Commission ("Commission"). This Request for Mediation is filed as an alternative to filing an answer to the Complaint of Sterling Moody, Sterling's Market Place, and Sterling's Place, I ("Complainants"). By filing this Request for Mediation, Respondents:

1. Request that the complaint be referred to a neutral third-party mediator for voluntary mediation of the complaint;
2. Understand that the 30-day time period to respond to the complaint will be tolled while the Commission ascertains whether or not the Complainants are also willing to submit to voluntary mediation;

3. Understand that if the Complainants decline the opportunity to seek mediation, Respondents will be notified in writing that the tolling has ceased and the date by which an answer or notice of satisfaction must be filed.

WHEREFORE, as set forth above, Union Electric Company d/b/a AmerenUE, respectfully requests mediation in this case.

Dated: September 20, 2001

Respectfully submitted,

AmerenUE

By: James J. Cook (Signature)  
James J. Cook, MBE #22697  
Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P. O. Box 66149 (MC 1310)  
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314-554-2237  
314-554-4014 (fax)  
[jjcook@ameren.com](mailto:jjcook@ameren.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via U.S. first-class mail on this 20<sup>th</sup> day of September, 2001, on the following parties of record:

**CASE NO. EC-2002-112**

**Office of the Public Counsel**  
P. O. Box 7800  
Jefferson City, MO 65102

**General Counsel**  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**Freeman R. Bosley, Jr.**  
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James J. Cook