

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 Staff's Motion For Protective Order**.

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 black 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

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

The Staff of the Missouri Public
Service Commission,

Complainant,

v.

Union Electric Company, d.b.a.
AmerenUE

Respondent.

Case No. EC-2002-1025

RESPONSE TO STAFF'S MOTION FOR PROTECTIVE ORDER

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 a Protective Order in the new complaint matter (EC-2002-1025).

1. The Company requests the Commission to issue said Protective Order. If the Commission issues a Notice in this matter and the parties proceed to conduct additional discovery and submit additional testimony, confidential material may very well be provided to the Staff and other parties.

2. Accordingly, the Company supports this request for a Protective Order as requested by the Staff.

WHEREFORE, the Company requests that the Protective Order requested by the Staff be issued.

Respectfully submitted,

UNION ELECTRIC COMPANY

By: 

James J. Cook, MBE #22697

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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:

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