

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

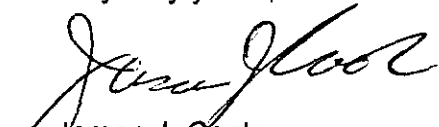
Re: MPSC Case No. EM-96-149

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 To Consolidate Instant Proceeding With Staff Complaint Case 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,


James J. Cook
Managing Associate General Counsel

JJC/vww

Enclosures

15882

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

The Staff of the Missouri Public)	
Service Commission,)	
)	
Complainant,)	
)	
)	
v.)	Case No. EM-96-149
)	
)	
Union Electric Company, d.b.a.)	
AmerenUE)	
)	
Respondent.)	

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

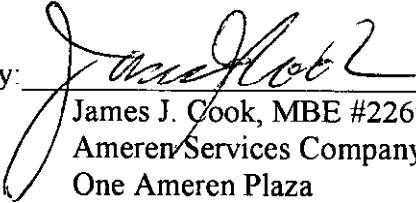
COMES NOW Union Electric Company, d/b/a AmerenUE (“the Company”) and in response to the Staff’s filing of April 15, 2002 wherein Staff requests that the two matters concerning the “6th Sharing Period” be consolidated.

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

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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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