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June 25, 2002

***Via Facsimile  
And Regular Mail***

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; Sterling Moody, et al., v. Ameren UE, et al.

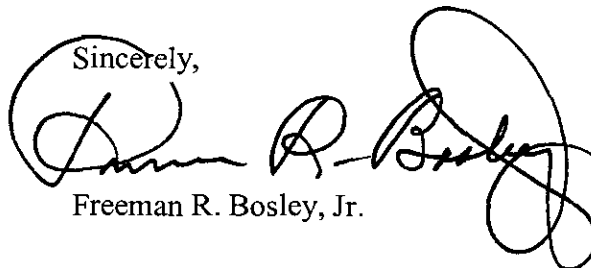
Dear Mr. Roberts:

Enclosed please find Complainants List of Issues and Order of Witnesses. There was a discussion earlier this morning between myself and Mike Vitale regarding the witnesses. However, there was not any discussion regarding the list of issues.

Please accept this as Complainants' list of issues in this matter.

Thanking you in advance.

Sincerely,



Freeman R. Bosley, Jr.

FRB/krt  
Enclosures

Cc: Via facsimile and regular mail  
Steve Dottheim  
John Coffman

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Sterling Moody, Sterling's Market Place,	)	
And Sterling's Place, I	)	
	)	
Complainants,	)	Case No.: EC 2002-112
	)	
v.	)	
	)	
AmerenUE, Union Electric Co. d/b/a	)	
AmerenUE; and Mike Foy, Leroy Ettling,	)	
And Sherry Moshner, as employees of	)	
AmerenUE,	)	
	)	
Respondents.	)	

**FINAL LIST OF ISSUES AND WITNESS LIST**

Come now the Complainants Sterling Moody, Sterling's Market Place and Sterling's Place I, and submit their List of Issues and Witness List.

The Complainants propose that the following list of Issues be heard and decided.

1. Whether the premises located at 8350 N. Broadway, St. Louis, Missouri 63147, formerly known as Sterling's Market Place was properly wired for electrical service.
2. Whether Respondents failed to make the proper billing adjustments for the period involved.
3. Whether Respondents gave Complainants proper notice for termination prior to terminating Complainants' electric service on April 10, 2001.
4. Whether Respondent gave Complainant proper notice for termination prior to terminating Complainant's electric service on April 17, 2001.
5. Whether Respondents violated Public Service Commission rules, regulations and tariffs by requiring Complainants to put up a \$45,000 deposit before service could be restored.
6. Whether the contract between Complainants and Respondents during the time in question constituted arrangements for partial payments and as a constructive payment plan.
7. Whether the May 18, 2001 agreement established a successor account or third party guarantors.

8. Whether the May 18, 2001 agreement was an arms-length transaction and a settlement of the claims between Complainants and Respondents.

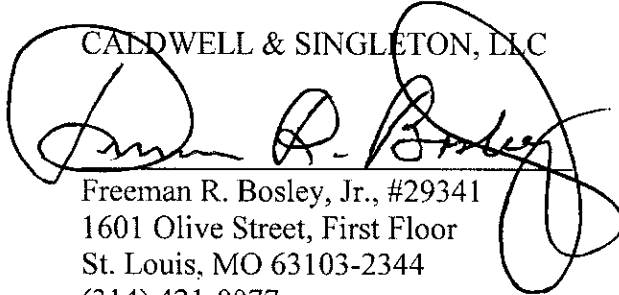
9. Whether Respondents subjected Complainants to any undue or unreasonable prejudice or disadvantage in the provision of electric service because of Complainants race or geographic al location.

Complainants intend to call the following witnesses:

Sterling Moody  
Louis Biernbaum  
Brian McNamara

Respectfully submitted,

CALDWELL & SINGLETON, LLC



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*Attorneys for Complainants  
Sterling Moody, Sterling's Market Place  
And Sterling's Market Place, I*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing List of Issues and Witness List was mailed/sent via facsimile as indicated to all counsel of record on this 25<sup>th</sup> day of June, 2002.

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

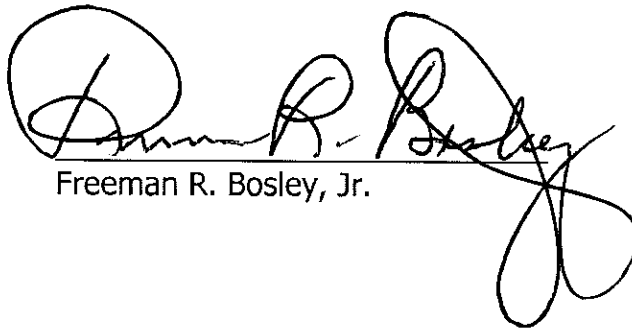
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