

**Ameren Services**  
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efitzhenry@ameren.com

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

July 28, 2003

**VIA FEDERAL EXPRESS**

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

**FILED<sup>4</sup>**

**JUL 29 2003**

**Missouri Public  
Service Commission**



Re: Variance for West Pine Apartments

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, please find an original and eight (8) copies of its: **Application for Variance** and **Motion to Admit Pro Hac Vice**.

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 "Edward C. Fitzhenry", with a stylized flourish at the end.

Edward C. Fitzhenry  
Associate General Counsel

ECF/acs  
Enclosures

cc: Missouri Public Service Commission  
Office of the Public Counsel

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

Application of Union Electric Company	)	
for a Variance	)	Case No. _____
for West Pine Apartments	)	

**MOTION TO ADMIT PRO HAC VICE**

COMES NOW Edward C. Fitzhenry, on behalf of Union Electric Company d/b/a AmerenUE, and pursuant to 4 CSR 240-2.040 (C), states as follows:

1.      Movant is employed by Ameren Services Company as an Associate General Counsel, who's office is in Missouri, to wit: 1901 Chouteau Avenue, St. Louis, MO 63103.
  
2.      Movant is currently not a member of the Missouri Bar but is in the process of preparing the application to become a member of said Bar. Movant is a member in good standing of the bars in the State of Illinois, United States Court of the Southern District of Illinois, and the 7<sup>th</sup> Circuit Court of Appeals. Movant is qualified to appear in all of these courts.
  
3.      Mr. Joseph R. Raybuck, Managing Assistant General Counsel for Ameren Services Company, is a member in good standing of the Missouri Bar having an office in Missouri, to wit: 1901 Chouteau Avenue, St. Louis, MO 63103. Mr. Raybuck will enter his appearance as attorney of record along with Movant.

Wherefore, for the reasons set forth above, Edward C. Fitzhenry respectfully requests that the Missouri Public Service Commission grant this motion and allow him to enter his appearance and represent Union Electric Company d/b/a AmerenUE in this

proceeding before the Missouri Public Service Commission, and for such other and further relief as deemed equitable and just.

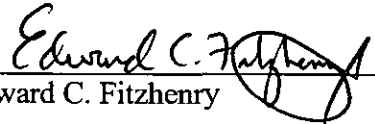
Respectfully submitted,

By Edward C. Fitzhenry  
Edward C. Fitzhenry  
Ameren Services Company  
1901 Chouteau Avenue  
P.O. Box 66149 (M/C 1310)  
St. Louis, Missouri 63166-6149  
(314) 554-3533  
(314) 554-4014 (fax)

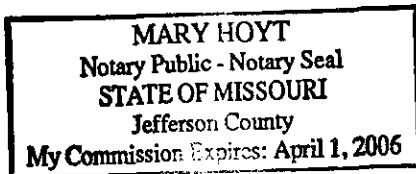
VERIFICATION

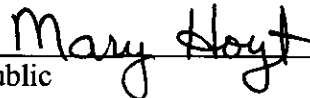
STATE OF MISSOURI     )  
                                      ) SS.  
CITY OF ST. LOUIS     )

I, Edward C. Fitzhenry, an attorney for Union Electric Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information and belief, and that I am authorized to file such document on behalf of Union Electric Company.

  
\_\_\_\_\_  
Edward C. Fitzhenry

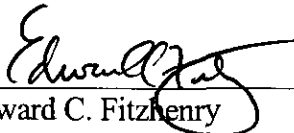
Subscribed and sworn to before me this 28<sup>th</sup> day of July, 2003.



  
\_\_\_\_\_  
Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the Staff of the Missouri Public Service Commission and Office of Public Counsel, by first class mail, postage prepaid, on this 28<sup>th</sup> day of July, 2003.

  
\_\_\_\_\_  
Edward C. Fitzhenry