

February 15, 2002

VIA HAND DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

FILED³

FEB 15 2002

**Missouri Public
Service Commission**

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 **Request to Modify Schedule**.

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 / sh

James J. Cook
Managing Associate General Counsel

JJC/mlh
Enclosures



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

FEB 15 2002

Missouri Public
Service Commission

In the Matter of the Application of Union)
Electric Company for an order authorizing)
(1) certain merger transactions involving)
UE Company, (2) the transfer of certain)
assets, real estate, leased property,)
easements and contractual agreements to)
Central Illinois Public Service Company,)
and (3) in connection therewith, certain)
other related transactions.)

Case No. EM-96-149

**UNION ELECTRIC COMPANY'S
REQUEST TO MODIFY SCHEDULE**

COMES NOW Union Electric Company d/b/a AmerenUE ("the Company") and requests that the Commission modify the current schedule in the above referenced matter to allow the Company and the Staff an opportunity to resolve areas of disagreement concerning the Third Sharing Period of the Second Experimental Alternative Regulation Plan ("EARP"). In further explanation of this request, the Company states as follows:

1. On December 18, 2001, the Commission issued an Order Granting Staff Leave to Late-File its Motion for Extension of Deadline and Order Granting Extension of Filing Date. That Order granted Staff's request to extend the deadline for filing its Notice of Areas of Disagreement (Notice) until February 19, 2002. The Company had no objection to that action.

2. In previous Sharing Periods, the Company and Staff have met before the filing of such Notice, in an attempt to resolve as many issues as possible. Historically, for most sharing periods, such meetings have resulted in the elimination of the need for any further proceedings to determine the final amount to be credited to customers pursuant to the terms of the EARPs.

3. Due primarily to the press of matters related to the pending rate complaint case and (EC-2002-1) and other important Company matters, the Company and Staff have been unable to meet to review the issues that would be in Staff's Notice.

4. Accordingly, the Company respectfully requests that the Commission modify the current date set for the Staff's filing of their Notice of Areas of Disagreement, from February 19, 2002 to March 8, 2002. The Staff has authorized the Company to state that the Staff joins in this request. In addition, the Office of Public Counsel has been informed of this filing and has authorized the Company to state that it has no objection.

5. The Company regrets filing this pleading on such short notice before the current deadline. The Company and the Staff have been attempting to schedule a meeting prior to the current deadline, and have continued that effort through yesterday evening, but without success. It had been hoped and expected that the meeting or meetings could be held by now. Since that is now obviously impossible, it has become necessary to file this pleading.

6. The Company suggests that the delay caused by this request is minimal and that the potential benefit of allowing time for the parties to meet in an attempt to narrow the areas of disagreement will outweigh the slight delay caused thereby.

WHEREFORE, for the reasons set forth above, Union Electric Company requests that the Commission modify the current procedural schedule so that the date for filing the Staff's Notice of Areas of Disagreement, now due on February 19, be changed to March 8, 2002.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By James J. Cook / st
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Managing Associate General Counsel

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DATED: February 15, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via fax and first-class U. S. Mail, on this 15th day of February, 2002, on the following parties of record:

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