Ameren Services (314) 554-3533 (314) 554-4014 (fax) efitzhenry@ameren.com One Ameren Plaza 1901 Chouteau Avenue PO Box 66149 St. Louis, MO 63166-6149 314.621.3222

August 1, 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 AUG 0 4 2003

Missouri Public Service Commission



Re: Matthews-East Prairie Line

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: 1) Application 2) Motion to Admit Pro Hac Vice and 3) Entry of Appearances for Edward C. Fitzhenry and Joseph H. Raybuck.

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,

Edward C. Fitzhen 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 Permission and Authority to	)		Missouri Public Se <b>rvise Geminissie</b> n
Construct, Operate, Own and Maintain a	í		- 0.07
34.5 kilovolt Distribution Line in New	)	Case No.	
Madrid County, Missouri and Mississippi	)		·· <del>·····</del>
County, Missouri ("Matthews-East Prairie	)		
Line")			

#### 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(3)(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. Ameren Services Company is a subsidiary of Ameren Corporation providing among other services, legal services to the subsidiaries of Ameren Corporation, including Union Electric Company d/b/a AmerenUE. The name of the real party in interest in this proceeding is Union Electric Company d/b/a AmerenUE, and is the party being represented by Movant.
- 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 (#6180218), 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.

4. No member of the legal department of Ameren Services Company is disqualified to appear in any courts in which Movant is admitted.

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 in conjunction with Mr. Raybuck before the Missouri Public Service Commission, and for such other and further relief as deemed equitable and just.

Respectfully submitted,

Edward C. Fitzhenry

Licensed: State of Illinois

ARDC #6180218

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 d/b/a AmerenUE, 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 d/b/a AmerenUE.

Subscribed and sworn to before me this /st day of length, 2003.

CAROL A. HEAD

Notary Public - Notary Seal

Notary Public

STATE OF MISSOURI St. Charles County

My Commission Expires: Sept. 23, 2006

### 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 <u>lot</u> day of luguet, 2003.

Edward C. Fitzhenry