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December 8, 2003

VIA FACSIMILE and U.S. MAIL
573-751-5562

Mr. John B. Coffman
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102-2230



Re: MPSC Case No. EO-2004-0108
AmerenUE's Application to Transfer Assets to AmerenCIPS

Dear Mr. Coffman:

AmerenUE hereby objects to Data Request Nos. 551, 552, 553, 554, 555, 556, 564, 568, 569, 570 (except for AmerenUE), 571 (except for AmerenUE), 572 (except for AmerenUE), 573 (except for AmerenUE), 576 (except for AmerenUE) and 578 (except for AmerenUE) submitted by the Office of the Public Counsel in the above referenced case in that these Data Requests seek information that is not relevant to any of the issues in the case and not likely to lead to the discovery of admissible evidence.

Also, Data Request No. 554 seeks information in FERC Docket No. EC-03-53. The Office of Public Counsel is a party to that case and has already received information from Ameren about that case. In any event, the proper docket to do discovery regarding that information is in the FERC docket.

Data Request Nos. 570, 571, 572, 573, 576 and 578 seek information about Ameren entities other than AmerenUE. To such extent, AmerenUE objects to these Data Requests on the grounds that they are not relevant to any of the issues in the case and not likely to lead to the discovery of admissible evidence. Without waiving our objection to these data requests, we will provide the information that pertains to AmerenUE.

If you have any questions, please contact me to discuss our objection to this data request.

Sincerely,

A handwritten signature in black ink that reads "Joe H. Raybuck".

Joseph H. Raybuck
Managing Assistant General Counsel

Enclosures
JHR/mlh

a subsidiary of Ameren Corporation

ATTACHMENT 1

DEC 11 2003

AMERENUE
CASE NO. EO-2004-108

REQUESTED BY: RYAN KIND
REQUESTED FROM: CRAIG NELSON
DATE OF REQUEST: DECEMBER 3, 2003

INFORMATION REQUESTED: Please provide a copy of all documents that Ameren or its affiliates have received from other entities (or their agents) within the last year that contain expressions of interest in discussing purchase power agreements of one year or longer for the sale of power to Ameren or its affiliates. If AmerenUE's response to this DR does not include all documents within the scope of those requested due to AmerenUE's belief that the excluded documents are covered by attorney client privilege or the attorney work product doctrine or some other objection, please provide the following information regarding each excluded document: the document's date, title, author, recipients, a general description of its contents, and a specific citation of the particular privilege cited.

THIS RESPONSE INCLUDES:

☐ Printed Materials _____ Total Pages ☐ Magnetic Media _____ Number of disks or tapes
Please number each section of multiple pages as: File formats for data:
of Total

LIST PRINTED MATERIALS AND/OR FILES INCLUDED:

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present known facts to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

DATE RECEIVED: _____ SIGNED BY: _____
TITLE: _____

AMERENUE
CASE NO. EO-2004-108

REQUESTED BY: RYAN KIND
REQUESTED FROM: CRAIG NELSON
DATE OF REQUEST: DECEMBER 3, 2003

INFORMATION REQUESTED: Please provide a copy of all documents that have been created by or for Ameren or its affiliates within the last three years that contain descriptions or analysis of, or references to, the interest expressed by any entities (or their agents) that have contacted Ameren or its affiliates and expressed an interest in discussing the possible sale of generation facilities to Ameren or its affiliates. If AmerenUE's response to this DR does not include all documents within the scope of those requested due to AmerenUE's belief that the excluded documents are covered by attorney client privilege or the attorney work product doctrine or some other objection, please provide the following information regarding each excluded document: the document's date, title, author, recipients, a general description of its contents, and a specific citation of the particular privilege cited.

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AMERENUE
CASE NO. EO-2004-108

REQUESTED BY: RYAN KIND
REQUESTED FROM: CRAIG NELSON
DATE OF REQUEST: DECEMBER 3, 2003

INFORMATION REQUESTED: Please provide a copy of all documents that Ameren or its affiliates have received from other entities (or their agents) within the last three years that contain expressions of interest in discussing the possible sale of generation facilities to Ameren or its affiliates. If AmerenUE's response to this DR does not include all documents within the scope of those requested due to AmerenUE's belief that the excluded documents are covered by attorney client privilege or the attorney work product doctrine or some other objection, please provide the following information regarding each excluded document: the document's date, title, author, recipients, a general description of its contents, and a specific citation of the particular privilege cited.

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<u>#</u> of <u>Total #</u>			

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DATE RECEIVED: _____

SIGNED BY: _____

TITLE: _____

AmerenUE's Response to
OPC Data Request
MPSC Case No. EO-2004-0108
AmerenUE's Application to Transfer Assets to AmerenCIPS

No. 588:

Request From: Ryan Kind

Please identify the individual(s) that have the ultimate authority to make resource planning decisions on behalf of AmerenUE. For each individual identified, please specify the Ameren affiliate(s) where they are employed, the position(s) held at each such affiliate, and the role that each individual has in AmerenUE's resource planning process.

Response:

Gary L. Rainwater is employed as Chairman, President and Chief Executive Officer for Union Electric Company d/b/a AmerenUE. In his position as Chief Executive Officer, Mr. Rainwater is the ultimate decision-maker in the resource planning process.

Prepared By: Rick Voytas
Title: Manager – Corporate Analysis
Date: January 7, 2004