

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

In the Matter of the Application of)
Union Electric Company for Authority)
To Continue the Transfer of)
Functional Control of Its Transmission)
System to the Midwest Independent)
Transmission System Operator, Inc.)

Case No. EO-2011-0128

MOTION FOR ADDITIONAL INFORMATION CONCERNING RECUSAL

COMES NOW the Office of the Public Counsel and for its Motion for Additional Information Concerning Recusal states as follows:

1. On February 8, 2012, at 8:29:11 AM, Janet Wheeler, advisor to Commissioner Jarrett, filed a Notice that she would “not be participating or advising any Commissioner, the General Counsel, or any Missouri Public Service Commission employee” with regard to this case. This notice of recusal, filed more than fifteen months after the case started and less than one minute before the evidentiary hearing started, gave no information about what created the need for Ms. Wheeler to recuse herself.

2. Public Counsel requests that the notice be supplemented with at least the following information: 1) what event or events lead to the recusal; 2) when the event(s) occurred; 3) if there is a period of time between the event(s) and the notice of recusal, whether Ms. Wheeler had any communications concerning this case with “any Commissioner, the General Counsel, or any Missouri Public Service Commission employee” during that period; and 4) the substance of any such communications.

WHEREFORE, Public Counsel respectfully requests that the record in this case be supplemented as described herein.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed this 28th day of February 2012 to all parties of record.

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