

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

| | | |
|---------------------------------------|---|-----------------------|
| Application of Union Electric Company |) | |
| for a Variance |) | Case No. EE-2004-0069 |
| for West Pine Apartments |) | |

RESPONSE TO ORDER DIRECTING FILING

On July 30, 2003 the Missouri Public Service Commission ("Commission") entered its Order Directing Filing directing Edward C. Fitzhenry to supply more information regarding his request to be admitted to practice Pro Hac Vice before the Commission and also orders the designated Missouri attorney to file an Entry of Appearance.

1. In response thereto, filed contemporaneously with this filing, is an Entry of Appearance by Mr. Joseph H. Raybuck. As stated in the Motion to Admit Pro Hac Vice, Mr. Raybuck is the 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.

2. In further response to the Order Directing Filing, Movant states he is employed by Ameren Services Company, which is a subsidiary of Ameren Corporation. Ameren Services Company provides, 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 of interest in the instant matter is Union Electric Company d/b/a AmerenUE, and is the party being represented by Movant and Mr. Raybuck.

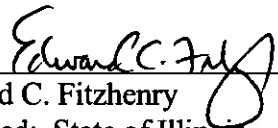
3. No member of the legal department of Ameren Services Company is disqualified to appear in any court in which Movant is admitted. Movant is a member in good standing of the bars

in the State of Illinois (#6180218), United States Court of the Southern District of Illinois, and the Seventh Circuit Court of Appeals.

4. Movant seeks to file this pleading instantter which was due on August 9, 2003, Saturday, stating this is the first business day in which the filing could be made, and stating further that professional and unexpected family commitments prevented him from making an earlier filing.

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

By 
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.

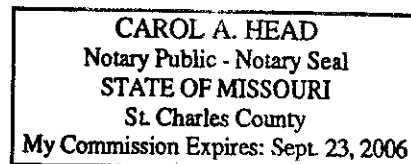


Edward C. Fitzhenry

Subscribed and sworn to before me this 11 day of August, 2003.

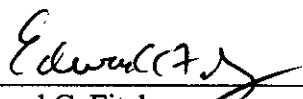


Notary Public



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 11 day of August, 2003.



Edward C. Fitzhenry