

June 17, 2002

VIA FEDERAL EXPRESS

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

RE: MPSC Case No. EO-2002-351

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 **Motion for Protective Order**.

In order to facilitate discovery, the Company is requesting that its Motion be granted on an expedited basis.

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.

Thank you.

Yours very truly,



Joseph H. Raybuck
Associate General Counsel

JHR/vww
Enclosures

cc: Service List

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Application of Union Electric Company)
for Permission and Authority to Construct,)
Operate, Own and Maintain a) Case No. EO-2002-351
345 kilovolt Transmission Line in Maries,)
Osage, and Pulaski Counties, Missouri)
("Callaway – Franks Line"))

MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), a Missouri corporation, and hereby requests that the Commission issue on an expedited basis its standard Protective Order for "Highly Confidential" and "Proprietary" information as defined by the Commission. In support of its Motion, AmerenUE states as follows:


1. Through discovery, the Office of the Public Counsel and other parties have requested information from AmerenUE which is confidential.
2. In order to protect this confidential information, and to prevent harm to the Company, and possibly to its customers also, the Company requests that the Commission issue its standard Protective Order in this case for "Highly Confidential" and "Proprietary" information. Possibly, discovery requests directed by the Company to the other parties to this matter will call for documents designated as confidential by one or more of such other parties.
3. In order to facilitate discovery, and to adhere to a proposed procedural schedule that has been agreed to among the parties, the Company requests that its Motion be granted on an expedited basis.

4. Based on discussions at the Prehearing Conference on June 13, it is the Company's understanding that all of the parties to this matter are in agreement that it is appropriate for the Commission to issue its standard Protective Order on an expedited basis.

WHEREFORE, for the foregoing reasons, Union Electric Company respectfully requests that the Commission issue a Protective Order in this case on an expedited basis for "Highly Confidential" and "Proprietary" information.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
Its Attorney

Joseph H. Raybuck, Mo. Bar No. 31241
Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue (MC 1310)
St. Louis, MO 63103
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2976
(314) 554-4014 (fax)
jraybuck@ameren.com

Dated: June 17, 2002

CERTIFICATE OF SERVICE

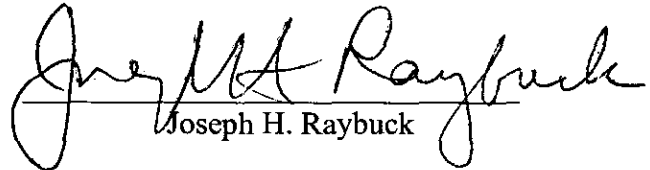
I hereby certify that a copy of the foregoing was served via first-class, U.S. mail, postage prepaid, to the following parties on this 17th day of June, 2002.

Mr. Bruce Bates
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

Mr. John Coffman
Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101

Mr. James B. Deutsch
Blitz, Bardgett & Deutsch, L.C.
308 East High Street, Suite 301
Jefferson City, MO 65101-3237

Mr. James B. Lowery
Smith Lewis, LLP
City Centre
111 S. Ninth Street, Suite 200
Columbia, MO 65205-0918


Joseph H. Raybuck