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June 21, 2001

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General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. ES-2001-359

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **RESPONSE TO AMERENUE'S RESPONSE TO STAFF'S INCIDENT REPORT.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Eric William Anderson
Assistant General Counsel
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EWA:ccl
Enclosure
cc: Counsel of Record

FILED³

JUN 21 2001

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JUN 21 2001

Missouri Public
Service Commission

In the Matter of Union Electric Company)
d/b/a AmerenUE regarding an incident at)
the Venice Power Plant in Venice, Illinois)
on August 10, 2000.)

Case No. ES-2001-359

RESPONSE TO AMERENUE'S RESPONSE TO STAFF'S INCIDENT REPORT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Response states:

1. The Missouri Public Service Commission ("Commission") established a case, pursuant to the provisions of Section 393.140 RSMo 2000, for the purpose of receiving information from Union Electric Company, doing business as AmerenUE ("AmerenUE") on the fire and electrical faults, which occurred at AmerenUE's Venice Power Plant in Venice, Illinois on Tuesday, August 10, 2000, at approximately 5:55 p.m.

2. As a result of the fire and electrical faults, extensive damage to the Unit # 1, a 40 MW gas or oil fired unit, was sustained. In addition, failure of station transformers and transformers in the adjoining substation, plus damage to other facilities in the plant, resulted in significant damage at the Venice, Illinois Power Plant. There were no fatalities or major injuries reported as a result of this incident.

3. On December 8, 2000, Staff filed a Motion to Open Case.

4. On December 26, 2000, the Commission opened the Case.

5. On April 25, 2001, the Staff filed its incident report along with a motion for protective order.

6. On May 7, 2001, AmerenUE filed its initial response to Staff's incident report and motion for protective order.

7. On May 15, 2001, AmerenUE filed its notice for request for protective order.

8. On June 1, 2001, the Commission granted the protective order and directed filing.

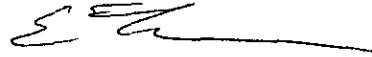
9. On June 11, 2001, AmerenUE filed its response to Staff's incident report and gave a response concerning the protective order.

10. Staff has reviewed the response of AmerenUE and finds the response to be adequate. The Staff recommends the Commission order AmerenUE to file updates in this case when work is complete on each of the following items respecting the Venice, Illinois Power Plant: (a) weld inspection/repairs, (b) D.C. system upgrades, (c) substation upgrades and (d) fire control systems. According to the AmerenUE response, Staff would expect all update filings to be made by October 31, 2001. Thus, the Staff recommends that the Commission order AmerenUE to file a complete update by October 31, 2001, even if all work has not been completed by that date.

WHEREFORE, the Staff respectfully requests that the Commission order AmerenUE to file updates as to the weld inspection/repairs, D.C. system upgrades, substation upgrades and fire control systems of the Venice, Illinois Power Plant when the work is complete, but in any event by no later than October 31, 2001.

Respectfully submitted,

DANA K. JOYCE
General Counsel



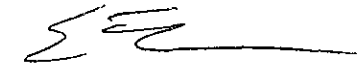
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 21st day of June 2001.



Service List for

Case No. ES-2001-359

Revised: June 21, 2001 (ccl)

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