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May 4, 2007

VIA E-FILING

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20024

RE: STB Finance Docket No. 35021, *Petition of Union Pacific Railroad Company for a Declaratory Order*

Dear Secretary Williams:

The following is filed on behalf of Ameren Energy Fuels and Services Company ("Ameren") in the above-captioned proceeding.

On April 26, 2007, Union Pacific Railroad Company ("UP") filed an Emergency Petition for Declaratory Order ("UP Petition") asking the Surface Transportation Board ("Board") to issue an order declaring that the Board's decision in *Rail Fuel Surcharges*, Ex Parte No. 661 (STB served Jan. 26, 2007) applies to traffic presently moving under Option 2 of UP's Circular 111. UP states that failure of the Board to issue such an order would "subject[] UP to potentially conflicting obligations that would prevent it from recovering its incremental fuel costs using a sound fuel surcharge program." UP Petition at 9.

The UP Petition raises important issues which should be allotted an appropriate timeframe to provide interested parties the opportunity to comment upon those issues. Ameren is an interested party and intends to file comments in response to UP's Petition. Normally replies or motions addressed to any pleading are due 20 days after the pleading is filed with the Board. 49 CFR § 1104.13. However, UP has request expedited handling of its Petition, which as stated above, raises important and multifaceted issues. Thus, Ameren is seeking confirmation that responses to UP's Petition will be due no sooner than May 16, 2007, which is 20 days after UP's Petition was filed with the Board.

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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Sandra L. Brown". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sandra L. Brown

*An attorney for Ameren Energy Fuels and Services
Company*

cc: Parties of Record