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February 13, 2004

FILED

FEB 13 2004

Mr. Dale Hardy Roberts  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Missouri Public  
Service Commission

**RE: Case No. GO-2004-0195**

In the Matter of an Investigation into Compliance with the Required  
Registration of Sellers of Electricity and Gas for Use or Consumption  
Within Missouri

Dear Mr. Roberts:

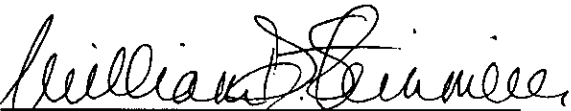
Enclosed for filing on behalf of Alliance Energy Services, LLC d/b/a  
Kentucky Alliance Energy Services, LLC ("Alliance Energy Services, LLC"),  
please find an original and five (5) copies of a **"Reply to Staff's Response to  
Request for Dismissal of Party"** in the above-styled matter.

Please see that this filing is brought to the attention of the appropriate  
Commission personnel.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By:   
William D. Steinmeier

Enclosures

cc: General Counsel  
Office of Public Counsel  
Counsel of Record

FILED

FEB 13 2004

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of an Investigation into )  
Compliance with the Required Registration )  
of Sellers of Electricity and Gas for Use or )  
Consumption Within Missouri )

Case No. GO-2004-0195

**REPLY TO STAFF'S RESPONSE TO REQUEST FOR DISMISSAL OF PARTY**

COMES NOW Alliance Energy Services, L.L.C., by and through counsel, and respectfully states the following in reply to "Staff's Response to Request for Dismissal of Party Filed by Alliance Energy Services, LLC" filed herein on February 11, 2004:

1. The original service list in this case included three different entities with the words "Alliance Energy" included in their company name, one of which is registered with the Missouri Secretary of State as "Alliance Energy LLC" and two of which are registered as "Alliance Energy Services, LLC." All three appear in the business database of the Missouri Secretary of State, available through that Office's official website.
2. Alliance Energy LLC shows a Principal and Registered Agent of Valeria Schall and an address in Lebanon, Missouri. Ms. Schall filed a letter in this case on January 23, 2004 stating that Alliance Energy does not offer natural gas service anywhere in the state nor elsewhere, and requesting dismissal from this case.
3. The Commission's "Order Dismissing Parties from Case" issued on January 30, 2004 named "Alliance Energy, LLC" in the body of the order as one of the parties requesting, and to be granted, dismissal from the

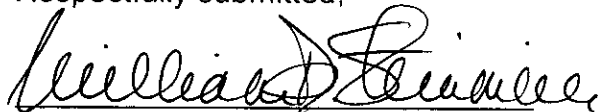
case. However, in the Ordered section, "ORDERED: 4," "Alliance Industries, LLC's" motion was granted. There being no such entity in the Missouri Secretary of State's database nor elsewhere in this case, it seems clear that the "Ordered" section was a simple mistake and that the January 30, 2004 Order intended to dismiss Alliance Energy LLC, Valeria Schall, Principal and Registered Agent, from the case.

4. On February 3, 2004, the undersigned attorneys filed an entry of appearance on behalf of "Alliance Energy Services, LLC." On February 4, 2004, the undersigned attorneys made an entry of appearance in person, at the Prehearing Conference in this matter, on behalf of "Alliance Energy Services, LLC." This is the Alliance Energy Services, LLC which was served with process in this case through CT Corporation in Clayton, Missouri. The Secretary of State's database correctly shows this to be a foreign (Kentucky) corporation. The formal, Missouri name of this company as registered with the Missouri Secretary of State's Office is "Alliance Energy Services, LLC d/b/a Kentucky Alliance Energy Services, LLC." It is a wholly-owned subsidiary of Constellation Energy Group, Inc. of Baltimore, Maryland. For purposes of keeping the players straight without a scorecard, we will refer to ourselves as "AES I".
5. On February 6, 2004, a "Motion for Dismissal of Party Alliance Energy Services, LLC" was filed on behalf of the "other" Alliance Energy Services, LLC (or, "AES II," if we may). The Secretary of State's database shows

Jason P. Doyle of Kansas City, Missouri as the Registered Agent for AES II, and his affidavit was attached to the Motion.

6. It thus appears clear that "AES II" is the subject, or intended subject, of "Staff's Response to Request for Dismissal ... " filed on February 11, 2004. Theirs ("AES II") is the only request for Dismissal pending at present before the Commission by a firm with the first name of Alliance, assuming, as we do, that it was the Commission's intention to dismiss Alliance Energy LLC, Valeria Schall, Principal and Registered Agent, from this case in its Order of January 30, 2004.
7. The instant party, Alliance Energy Services, LLC, d/b/a Kentucky Alliance Energy Services, LLC ("AES I"), has not requested dismissal from the proceeding as of the present time.
8. It is our hope that this will help clarify the current status of these matters and these like-named parties.

Respectfully submitted,



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Mary Ann (Garr) Young, MoBar #27951

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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document has been hand delivered or mailed, postage prepaid, this 13th day of February 2004, to the following counsel of record in this proceeding:

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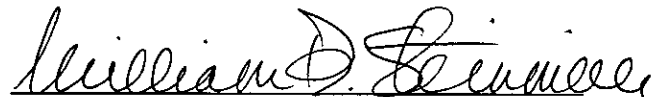
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