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April 24, 1996

Mr. David Rauch  
Executive Secretary  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Union Electric Company**  
**Case No. EM-96-149**

Dear Mr. Rauch:

Enclosed for filing in the above-referenced case please find the original and fourteen copies of **Joint Motion to Extend Filing Dates**.

Due the the nearness of the current filing date, we would appreciate it if you would treat this motion as expeditiously as possible.

I have on this date mailed or hand-delivered copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Lewis R. Mills, Jr.", written over a horizontal line.

Lewis R. Mills, Jr.  
Deputy Public Counsel

LRM:bjr

Enclosures

cc: Counsel of Record

**FILED**  
**APR 24 1996**  
**MISSOURI**  
**PUBLIC SERVICE COMMISSION**

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

In the matter of the application of Union )  
Electric Company for an order authorizing: )  
(1) certain merger transactions involving )  
Union Electric Company; (2) the transfer )  
of certain assets, real estate, leased )  
property, easements and contractual )  
agreements to Central Illinois Public )  
Service Company; and (3) in connection, )  
therewith certain other related transactions )

Case No. EM-96-149

**FILED**

**APR 24 1996**

**MISSOURI  
PUBLIC SERVICE COMMISSION**

**JOINT MOTION TO EXTEND FILING DATES**

COME NOW the Office of the Public Counsel (Public Counsel), Union Electric Company (UE), and Anheuser-Busch, Inc., Barnes and Jewish Hospitals, Chrysler Corporation, The Doe Run Company, Emerson Electric Company, Hussman Refrigeration, Lincoln Industrial, MEMC Electronic Materials, Mallinckrodt, Inc., McDonnell Douglas Corporation, and Monsanto Company (Industrial Intervenors), collectively Joint Movants, and for their Joint Motion to Extend Filing Dates, state as follows:

1. The parties to this case filed, on January 17, 1996, a Joint Motion to Approve Procedural Schedule. On January 22, 1996, the Public Service Commission (Commission) approved this procedural schedule.

2. As a result of numerous discussions between the Joint Movants over the last several days, the Joint Movants have agreed to propose a modification of the procedural schedule.

3. The Joint Movants propose that rebuttal testimony for all parties be changed from April 30, 1996 to May 7, 1996. They also propose that surrebuttal testimony for UE and cross-surrebuttal testimony for all other parties be moved from May 31, 1996 to June 3, 1996. No other changes to the procedural schedule would need to be made. The Joint Movants do not believe that these proposed procedural schedule changes will unduly inconvenience the other parties or the Commission.

4. Public Counsel has contacted the attorney of record for the Commission Staff, and he has stated that the Joint Movants may indicate that the Commission Staff has no objection to this joint motion. Counsel for the other parties in this case have been contacted, and none

expressed any objection to the proposed change in filing dates for rebuttal, surrebuttal, and cross-surrebuttal testimony.

5. The Commission Staff has asked that the Joint Movants include in this pleading for Commission approval what the Commission Staff hopes is the resolution of an additional procedural matter. This procedural matter involves the filing of supplemental testimony to reflect developments respecting the proposed merger which have occurred after UE filed its direct testimony in the instant docket in November of last year and the possible need to schedule limited additional hearing dates to address these developments.

Specifically, UE and CIPSCO Incorporated have proposed in their merger case before the Illinois Commerce Commission an alternative to the 30-year System Support Agreement, which alternative is not presently reflected in UE's instant case before this Commission, and UE and CIPSCO Incorporated announced in February of this year their decision to form a separate services company, Ameren Services Company, to provide administrative support services to UE and Central Illinois Public Service Company (CIPS), which decision also is not reflected in UE's instant case before this Commission. Much of the detail relating to the organization and operation of the service company, for example, the allocation of service company administrative and general expense to the operating companies (UE and CIPS), and responsibilities, functions, and services to be provided by the service company, is still being determined.

UE has agreed to file supplemental direct testimony on May 10, 1996 respecting the alternative to its 30-year System Support Agreement. The Staff proposes to file supplemental rebuttal testimony on this item on May 21, 1996, assuming that UE's proposal is the same as that which it has filed in Illinois. UE would then file its surrebuttal testimony on this issue on June 3, 1996, along with its other surrebuttal testimony. If UE's position is not different than that which is pending before the ICC, then this matter could be heard by the Commission in the context of the evidentiary hearings that are presently scheduled.

Ultimately, there may be no need for the Commission Staff to file responsive testimony on this alternative proposal if, as a result of the proceedings in Illinois, this proposal is not pursued in Missouri by UE. Unfortunately, this prospect is not known to the Commission Staff at this time.

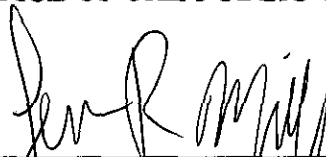
Regarding Ameren Services Corporation, UE would file its supplemental direct testimony on June 3, 1996, along with its surrebuttal testimony. If the information respecting Ameren Services Company were still not complete, UE would file that information which is available and indicate when the remaining information would be filed. Within several days of the filing of said supplemental direct testimony, the Commission Staff would be able to suggest dates for the filing of supplemental, rebuttal, and surrebuttal testimony and supplemental evidentiary hearing dates, if necessary, for this matter.

WHEREFORE, Joint Movants respectfully request that the Commission modify the procedural schedule in this case to allow for the filing of rebuttal testimony on May 7, 1996, and the filing of surrebuttal and cross-surrebuttal testimony on June 3, 1996. In addition, the Commission Staff, which is not one of the Joint Movants, requests that the Commission authorize the procedure set out in paragraph 5 above.

Respectfully submitted,

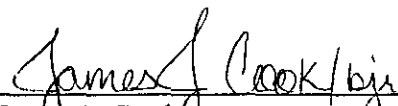
OFFICE OF THE PUBLIC COUNSEL

By

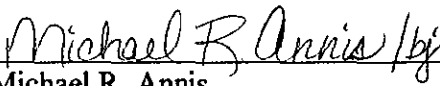
  
Lewis R. Mills, Jr. (#35275)  
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UNION ELECTRIC COMPANY

By

  
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ANHEUSER-BUSCH, INC., ET AL.

By   
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following on this 24<sup>th</sup> day of April, 1996:

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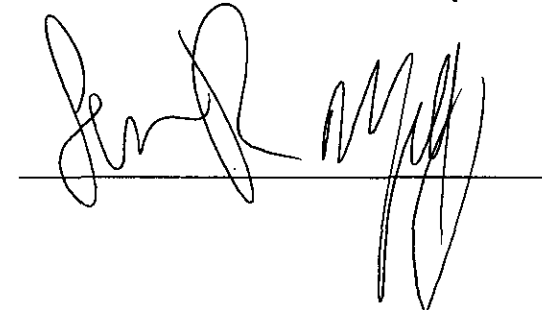
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Two handwritten signatures are present on a horizontal line. The signature on the left is 'James J. Cook' and the signature on the right is 'Joseph H. Raybuck'.