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## Missouri Public Serbice Commission

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November 2, 2000

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DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE 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. EO-2000-580

Dear Mr. Roberts:

FILED<sup>2</sup>
NOV 2 2000

Service Commission

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a JOINT MOTION TO RESCHEDULE HEARING AND REQUEST FOR EXPEDITED TREATMENT.

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,

Dennis L. Frey

Associate General Counsel

(573) 751-8700

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DLF/lb Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Service Commission

Alternative Rate Option for Interruptible

Customers of Union Electric Company

(b)/a AmerenUE.

## JOINT MOTION TO RESCHEDULE HEARING AND REQUEST FOR EXPEDITED TREATMENT

COME NOW Holnam, Inc., Lone Star Industries, Inc., and River Cement Company ("MEG Interruptibles") Union Electric Company d/b/a AmerenUE ("AmerenUE"), the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and the Office of the Public Counsel, hereinafter collectively to be known as "the "Parties," and respectfully state as follows:

- 1. On October 24, 2000, the Commission issued a notice in which it rescheduled to November 6, 2000, the evidentiary hearing in the above-styled case.
- 2. Unfortunately, on November 1, 2000, the Staff's only witness had a death in the family. As a result, he will be unavailable to participate in the necessary preparation of Staff's case in the few remaining days before the hearing. Given the key role played by Staff's witness in this case, the Parties acknowledge that, under the circumstances, to proceed with the hearing as currently scheduled would work an unnecessary hardship on the Staff's witness, with attendant adverse and unfair consequences for Staff's case.
- 3. Accordingly, the Parties hereby request that the hearing be rescheduled. The Parties have conferred and have agreed on a new hearing date of November 30, 2000. If that date proves unacceptable, the Parties would then suggest November 28, 2000 or November 29, 2000 (in that order).

4. Because only a few days remain before the current November 6 hearing date, the Parties believe that expedited treatment of this Motion is warranted.

WHEREFORE, the Parties respectfully move that the Commission reschedule the evidentiary hearing in this case from November 6, 2000 to November 30, 2000. If November 30 proves unacceptable, the Parties would then suggest November 28 or November 29, 2000 (in that order). Further, the Parties respectfully request that this Motion be accorded expedited treatment.

Respectfully submitted,

DANA K. JOYCE General Counsel

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Attorney for the MEG Interruptibles

## **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 2nd day of November 2000.

Cennis L. Frey

Service List for Case No. EO-2000-580 Revised: November 2, 2000 (lb)

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