



Missouri Public Service Commission

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March 17, 2000

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

FILED^2
MAR 17 2000

Missouri Public
Service Commission

RE: EM-96-149

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE NOTICE OF AREAS OF DISAGREEMENT.

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,

[Handwritten signature of Steven Dottheim]

Steven Dottheim
Chief Deputy General Counsel
(573) 751-7489
(573) 751-9285 (Fax)

SD/jb
Enclosure
cc: Counsel of Record

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

FILED²

MAR 17 2000

Missouri Public
Service Commission

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

**JOINT MOTION FOR EXTENSION OF DEADLINE TO
FILE NOTICE OF AREAS OF DISAGREEMENT**

COMES NOW the Office of the Public Counsel (Public Counsel) and the Staff of the Commission (Staff), collectively "Joint Movants," and for their Joint Motion for Extension of Deadline to File Notice of Areas of Disagreement state as follows:

1. On February 17, 2000, Company filed its Final Earnings Report filing for the First Sharing Period of the Second Experimental Alternative Regulation Plan. Pursuant to the Stipulation and Agreement approved in the above-styled case, signatories "have thirty (30) days after the final report is filed to provide notice that there may be areas of disagreement not previously brought to the attention of the Commission that need to be resolved." Ibid, Paragraph 7.f.x., pp. 15-16. Therefore, notice of such areas of disagreement would apparently be due on March 20, 2000.

2. In the past, the Joint Movants have met with Union Electric Company, d/b/a AmerenUE (Company) to discuss areas of disagreement that Public Counsel and the Staff have identified, before making their separate filings with the Commission. Such a meeting has not

occurred respecting the First Sharing Period of the Second EARP. The Staff and Public Counsel have inquired whether the Company would be interested in such a meeting and the Company has indicated that it would be interested in such a meeting. The Staff has advised the Company that the Staff has not completed its review of the Third Sharing Period.

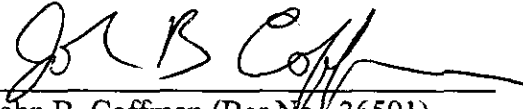
3. Because it is possible that certain areas of disagreement could be eliminated or narrowed and clarified at and subsequent to such a meeting, the Joint Movants respectfully request that the deadline mentioned in Paragraph 7.f.x. of the Stipulation and Agreement be extended until April 11, 2000.

4. The Company has indicated that it has no objection to the extension proposed by the Joint Movants.

WHEREFORE, the Joint Movants respectfully request that the Commission extend the deadline to provide notice of areas of disagreement not previously brought to the attention of the Commission regarding the Final Earnings Report filing for the First Sharing Period of the Second Experimental Alternative Regulation Plan until April 11, 2000.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been either faxed, mailed, or hand-delivered to the following parties of record on this 17th day of March, 2000.

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