

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

SEP 22 1999

Missouri Public
Service Commission

Paul and Rebecca Young
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-87

MOTION TO CONSOLIDATE COMPLAINT CASES

Comes now Union Electric Company, doing business as AmerenUE and respectfully requests that the Missouri Public Service Commission consolidate this complaint case with the other cases listed on Attachment 1 attached hereto. In support of this request, AmerenUE states the following:

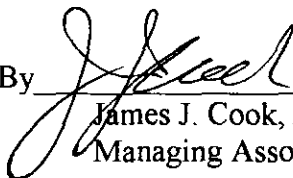
1. On August 23, 26, 30, and September 2, the Commission issued 43 Notices of Complaint against Union Electric Company.
2. All of the complaint cases have the same factual situations underlying them-- that is a series of power outages in one area of AmerenUE's electric service territory. Almost all of the complaints contain the same typed words setting out the complaint, with only the name of the complainant handwritten at the top of the pleading. As such, it is obvious that each complaint case involves the same concerns about AmerenUE's actions.
3. AmerenUE submits that its answer to the complaints, and its defense to each of them, should hearings be required will be the same in every case.
4. Some Complainants have set out specific concerns about the effects of the outages. These additional claims do not significantly change the basic claims of the complaints, nor the defense that the Company would make if the cases go to hearing.

5. The Staff of the Missouri Public Service Commission has indicated to the undersigned attorney for AmerenUE that the Staff does not object to the consolidation of this case.

WHEREFORE, for the reasons stated above, AmerenUE asks that the Commission order that this case be consolidated for all purposes, with the other similar cases set out on Attachment 1, as appropriate under the Commission's rules.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
James J. Cook, MBE 22697
Managing Associate General Counsel

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One Ameren Plaza
1901 Chouteau Avenue
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St. Louis, MO 63166-6149
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(314) 554-4014 (fax)

DATED: September 21, 1999

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first-class U.S. mail, postage prepaid, on this 21st day of September, 1999, to the Office of Public Counsel and Complainant.


James J. Cook

ATTACHMENT 1

Frank E. Dilley
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-63

Marshall E. Humphreys, III
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-64

Donald L. Hibler
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-70

Quentin Lupardus
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-71

John J. Williams, II
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-72

Georgette A. Patterson
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-73

Donald D. Patterson
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-74

William W. Patterson
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-75

Joseph P. Aliksaites
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-76

Mildred Aliksaites
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-77

Herbert Nixdorf
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-78

Linda Sue Nixdorf
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-79

Jo Ann Jeffries
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-80

James Aliksaites
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-81

Betty J. Drace
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-82

James M. Myers
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-83

| | | |
|------------------------|---|---------------------|
| Lucretia Drace |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-84 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| David and Brenda Haley |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-86 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Paul and Rebecca Young |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-87 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Sharon K. Abbott |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-88 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

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|------------------------|---|---------------------|
| Gene S. Bax |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-89 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Robert J. Sparrow |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-90 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Pauline Hensley |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-93 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Douglas Zeigenbein |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-96 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

| | | |
|------------------------|---|---------------------|
| Paul R. Patterson |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-97 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

| | | |
|------------------------|---|---------------------|
| Jimmy J. Myers |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-99 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

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|------------------------|---|----------------------|
| Dustin J. Myers |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-100 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

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|------------------------|---|----------------------|
| Stephanie S. Myers |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-101 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

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|----------------------------|---|----------------------|
| James A. Pankey |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-104 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Deitra Brouk |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-132 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Kenneth and Marilyn Carico |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-136 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Lloyd E. Reed |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-137 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

Randolph E. Shipp
Complainant

V.

Case No. EC-2000-138

Union Electric Company
d/b/a AmerenUE
Respondent

Eddie Reed
Complainant

V.

Case No. EC-2000-139

Union Electric Company
d/b/a AmerenUE
Respondent

James and Melissa Carico
Complainant

v.

Case No. EC-2000-147

Union Electric Company
d/b/a AmerenUE
Respondent

Tammy Byrd
Complainant

v.

Case No. EC-2000-149

Union Electric Company
d/b/a AmerenUE
Respondent

| | | |
|------------------------|---|----------------------|
| Steve Byrd |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-150 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Buster McGowin |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-151 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Myna McGowin |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-152 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |
| | | |
| Steven D. Patterson |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-174 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

Ruby Otto
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-183

Lonnie Jeffries
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-184

James and Rita Jeffries
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-201