

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>  
SEP 22 1999

Missouri Public  
Service Commission

James A. Pankey  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-104

**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:

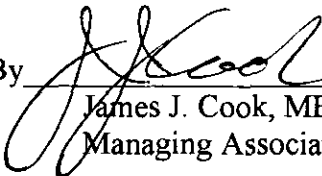
1. On August 23, 26, 30, and September 2, the Commission issued 43 Notices of Complaint against Union Electric Company.
2. All of the complaint cases have the same factual situations underlying them-- that is a series of power outages in one area of AmerenUE's electric service territory. Almost all of 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

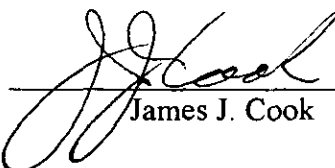
By   
James J. Cook, MBE 22697  
Managing Associate General Counsel

Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-2237  
(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 21<sup>st</sup> day of September, 1999, to the Office of Public Counsel and Complainant.

  
James J. Cook

**ATTACHMENT 1**

|                        |   |                     |
|------------------------|---|---------------------|
| Frank E. Dilley        | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-63 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

|                            |   |                     |
|----------------------------|---|---------------------|
| Marshall E. Humphreys, III | ) |                     |
| Complainant                | ) |                     |
|                            | ) |                     |
| v.                         | ) | Case No. EC-2000-64 |
|                            | ) |                     |
| Union Electric Company     | ) |                     |
| d/b/a AmerenUE             | ) |                     |
| Respondent                 | ) |                     |

|                        |   |                     |
|------------------------|---|---------------------|
| Donald L. Hibler       | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-70 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

|                        |   |                     |
|------------------------|---|---------------------|
| Quentin Lupardus       | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-71 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

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.                     | ) | Case No. EC-2000-76 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

|                        |   |                     |
|------------------------|---|---------------------|
| Mildred Aliksaites     | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-77 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

|                        |   |                     |
|------------------------|---|---------------------|
| Herbert Nixdorf        | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-78 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

|                        |   |                     |
|------------------------|---|---------------------|
| Linda Sue Nixdorf      | ) |                     |
| Complainant            | ) |                     |
|                        | ) |                     |
| v.                     | ) | Case No. EC-2000-79 |
|                        | ) |                     |
| Union Electric Company | ) |                     |
| d/b/a AmerenUE         | ) |                     |
| Respondent             | ) |                     |

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.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-84

David and Brenda Haley  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-86

Paul and Rebecca Young  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-87

Sharon K. Abbott  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-88

|                        |   |                     |
|------------------------|---|---------------------|
| 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.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-97

Jimmy J. Myers  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-99

Dustin J. Myers  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-100

Stephanie S. Myers  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-101

James A. Pankey  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-104

Deitra Brouk  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-132

Kenneth and Marilyn Carico  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-136

Lloyd E. Reed  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-137

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.                     | ) | Case No. EC-2000-183 |
|                        | ) |                      |
| Union Electric Company | ) |                      |
| d/b/a AmerenUE         | ) |                      |
| Respondent             | ) |                      |

|                        |   |                      |
|------------------------|---|----------------------|
| Lonnie Jeffries        | ) |                      |
| Complainant            | ) |                      |
|                        | ) |                      |
| v.                     | ) | Case No. EC-2000-184 |
|                        | ) |                      |
| Union Electric Company | ) |                      |
| d/b/a AmerenUE         | ) |                      |
| Respondent             | ) |                      |

|                         |   |                      |
|-------------------------|---|----------------------|
| James and Rita Jeffries | ) |                      |
| Complainant             | ) |                      |
|                         | ) |                      |
| v.                      | ) | Case No. EC-2000-201 |
|                         | ) |                      |
| Union Electric Company  | ) |                      |
| d/b/a AmerenUE          | ) |                      |
| Respondent              | ) |                      |