

JAMES K. COOK
CHARLES A. WERNER
CHRISTOPHER T. HEXTER
MARILYN S. TEITELBAUM
JAMES I. SINGER
LISA S. VANAMBURG
SALLY E. BARKER
ARTHUR J. MARTIN
NEAL M. DAVIS
THOMAS J. GRADY
MARY M. LINDMARK
KEVIN F. FAGAN
ELLIOT M. UCHITELLE

LAW OFFICES

SCHUCHAT, COOK & WERNER

THE SHELL BUILDING, SECOND FLOOR
1221 LOCUST STREET
SAINT LOUIS, MISSOURI 63103-2364

314 621-2626
FAX: 314 621-2378

STANLEY R. SCHUCHAT
(1939-79)
ARTHUR H. NISSENBAUM
OF COUNSEL
MARSAN K. STROMBERG
OF COUNSEL

January 18, 1996

Executive Secretary
Missouri Public Service Commission
301 West High Street
Jefferson City, MO 65102

Re: Case No. EM-96-149

Dear Sir or Madam:

Enclosed for filing with the Commission are the original and 15 copies each of our Motion to Withdraw our previous Motion to Withdraw as Representative of Intervenors IBEW, Locals 2, 309, 702 and 1455. Copies of these filings have been served on the parties list on the Commission's service list in this case. Please file stamp and return one copy of this Motion in the enclosed self-addressed, stamped envelope. Thank you for your assistance.

Sincerely,


Marilyn S. Teitelbaum

MST: jlm
Enclosures
cc: Mr. Gary Roan
Mr. Mike Datillo
Mr. Jim Berger
Mr. Dave White
All parties

60395.1

RECEIVED
JAN 22 1996

MO. PUBLIC SERVICE COMMISSION

FILED
JAN 22 1996
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
JAN 22 1996
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

MOTION TO WITHDRAW MOTION TO WITHDRAW AS REPRESENTATIVE

COMES NOW, MARILYN S. TEITELBAUM of the law firm of SCHUCHAT, COOK & WERNER, and respectfully requests that the Missouri Public Service Commission reinstate her Entry of Appearance on behalf of Intervenors Locals 702, 309, 1455 and 2, IBEW.

The undersigned has been informed by the Missouri Public Service Commission that individual intervenors must have legal representation before the Missouri Public Service Commission. Previously, the undersigned had entered her appearance, but then requested to withdraw her appearance to ensure that the individual Union intervenors received service of all filings in this matter. However, having been informed that it is necessary to maintain legal representation before the Missouri Public Service Commission, the undersigned respectfully requests that her entry of appearance be reinstated on behalf of IBEW, Locals 2, 309, 702 and 1455.

The Unions respectfully request that the Commission and all parties provide service to them of all notices, filings and other

proceedings in this matter in addition to service to the undersigned.

Service of documents and notices should be sent to the following:

Gary Roan, Business Manager
Local 702, IBEW
106 North Monroe
West Frankfort, IL 62896
Telephone (618) 932-2102

Mr. Dave White
Local 2, IBEW
209 Flora Drive
P.O. Box 1045
Jefferson City, MO 65102
Telephone (314) 635-3311

Mr. Jim Berger
Local 309, IBEW
2000 Mall Street (Route 157)
Collinsville, IL 62234
Telephone (618) 345-5112

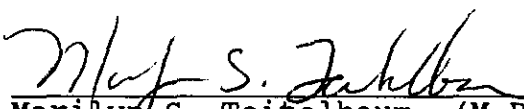
Mr. Michael Datillo
Local 1455, IBEW
5570 Fyler Avenue
St. Louis, MO 63139
Telephone (314) 351-6300

WHEREFORE, MARILYN S. TEITELBAUM of the law firm of SCHUCHAT, COOK & WERNER, respectfully requests that the Commission reinstate her Entry of Appearance in this matter.

DATED this 18th day of January 1996.

Respectfully submitted,

SCHUCHAT, COOK & WERNER
Attorneys for Locals 702, 309,
1455 and 2, IBEW


Marilyn S. Teitelbaum (M.B.E. #26074)
1221 Locust Street, Second Floor
St. Louis, MO 63103
(314) 621-2626
FAX: (314) 621-2378

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Motion to Withdraw as Representative was served upon the following by depositing a copy in the U.S. mail first-class, postage prepaid and properly addressed on this 18th day of January 1996:

Mr. Steven R. Sullivan
Attorney for Union Electric Company
1901 Chouteau Blvd.
P.O. Box 149
St. Louis, MO 63166

Mr. Richard French
1001 East Cherry, Suite 302
Columbia, MO 65102
Attorney for Intervenor Trigen
St. Louis Energy Corporation

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Gary Roan, Business Manager
Local 702, IBEW
106 North Monroe
West Frankfort, IL 62896

Mr. Dave White
Local 2, IBEW
209 Flora Drive
P.O. Box 1045
Jefferson City, MO 65102

Mr. Michael Datillo
Local 1455, IBEW
5570 Fyler Avenue
St. Louis, MO 63139

Mr. Jim Berger
Local 309, IBEW
2000 Mall Street (Route 157)
Collinsville, IL 62234



MARILYN S. TEITELBAUM