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**FILED**

July 3, 2000

**JUL 5 2000**

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

**Missouri Public  
Service Commission**

Re: Case # EO-2000-580 - Investigation into an Alternative Rate Option for  
Interruptible Customers of Union Electric Company

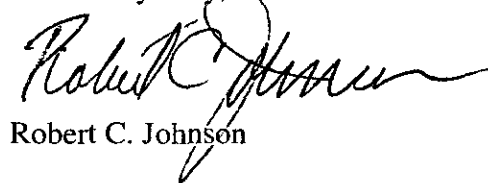
Dear Mr. Roberts:

Enclosed for filing on behalf of Holnam Inc., et al., are original and nine (9) copies of the  
following:

- 1) Suggestions in Support of Application for Approval for an Interim  
Alternative Interruptible Rate;
- 2) Related Motion for Oral Argument;
- 3) Motion for Expedited Schedule of Proceedings; and
- 4) Suggestions in Support of Motion for Expedited Schedule of Proceedings

I would appreciate your bringing these filings to the attention of the Commission and also  
file stamping and returning to the undersigned one (1) copy of each of the enclosed in the  
stamped self-addressed enveloped also enclosed.

Yours very truly,

  
Robert C. Johnson

Enclosure  
RCJ/mj

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JUL 5 2000

Missouri Public  
Service Commission

In the Matter of an Investigation )  
Into an Alternative Rate Option for )  
Interruptible Customers of Union )  
Electric Company d/b/a Ameren UE )

Case No. EO-2000-580

**Motion for Oral Argument**

Holnam Inc., Lone Star Industries, Inc., and River Cement Company ("MEG Interruptibles") have previously filed their Application for Approval of an Interim Alternative Interruptible Rate on or about March 20, 2000 and further have concurrently filed suggestions in support of their request for approval and implementation of such rate. MEG hereby requests oral argument on the issues raised in such pleadings.

In support of this Motion, the MEG Interruptibles state as follows:

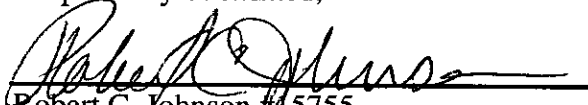
1. The issues raised in these pleadings including, without limitation, the issue of system reliability, have far-reaching consequences, and we submit, it would be beneficial and helpful to the Commission to permit oral argument by the parties thereon.
2. The benefits to the MEG Interruptibles under a prior interruptible tariff which had been in effect for many years at UE, were approximately \$2.4 million per year. Effective June 1 of this year, such benefits were terminated and accordingly the MEG interruptibles have been substantially and adversely impacted by such action. Granting of the Application for an Interim Alternative Interruptible rate and preservation of the status quo will avoid the adverse impact on these customers.
3. Because we are rapidly approaching the summer peak load season, time is of the essence and an early date for argument would be appropriate.

4. There are many other issues which are significant and we submit it would be helpful to discuss in oral argument before this Commission.

WHEREFORE, the MEG Interruptibles move this Commission to grant oral argument on their Application for Approval and Implementation of an Interim Alternative Interruptible Rate.

Dated at St. Louis, Missouri this 3rd day of July, 2000.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert C. Johnson", is written over a horizontal line.

Robert C. Johnson #15755  
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**CERTIFICATE OF SERVICE**

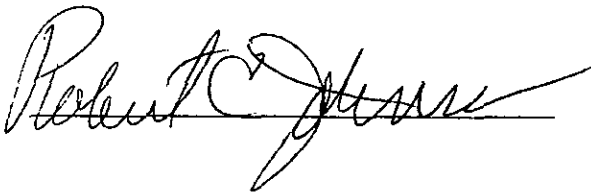
I hereby certify that a true and correct copy of the foregoing has been mailed or hand delivered to the following on this 3rd day of July 2000.

James J. Cook  
Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Ave.  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63146-6149

Steven Dottheim  
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A handwritten signature in black ink, appearing to read "Robert C. Jones", is written over a horizontal line.