Missouri Public Service Commission

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September 29, 2000

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

RE: Case No. EO-2000-580

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **PROPOSED LIST OF ISSUES, ORDER OF WITNESSES AND ORDER OF CROSS-EXAMINATION, AND MOTION TO ACCEPT OUT OF TIME.**

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,

Dennis L. Frey

Dennis L. Frey
Associate General Counsel
(573) 751-8700
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DLF/lb
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED[3]
SEP 2 9 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 AmerenUE.	))))	Case No. EO-2000-580

PROPOSED LIST OF ISSUES, ORDER OF WITNESSES AND ORDER OF CROSS-EXAMINATION, AND MOTION TO ACCEPT OUT OF TIME

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully states as follows:

1. On March 20, 2000, Holnam, Inc., Lone Star Industries, Inc. and River Cement Company (collectively, "MEG Interruptibles") filed an Application requesting, *inter alia*, that the Commission open a case for consideration of an alternative rate option for interruptible customers of Union Electric Company, d/b/a AmerenUE ("AmerenUE"), direct AmerenUE to prepare and file a proposed interruptible tariff incorporating the terms and conditions set forth in the Exhibit attached to said Application and approve such tariff to become effective on June 1, 2000, on an interim basis.

2. On March 23, 2000, the Commission, in its Notice Setting Time for Response, directed that responses to MEG Interruptibles pleading be filed by April 13, 2000. AmerenUE and the Staff filed responses on April 12th and April 13th respectively. Neither party objected, on procedural grounds, to the creation of an investigatory case. The Staff, in its pleading, requested that the Commission deny MEG Interruptibles' request for Commission approval of an interim interruptible rate option, set an intervention period, and schedule an early prehearing conference concerning the matter.

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3. On May 18, 2000, the Commission, *inter alia*, directed that a prehearing conference be held on June 21, 2000. The parties attended the scheduled conference and participated in discussions; however, they were unable to resolve the key issues in the case.

4. On July 5, 2000, MEG Interruptibles filed with the Commission: a) a motion for an expedited schedule of the proceedings, b) suggestions in support thereof, c) a motion for oral argument, and d) suggestions in support of its aforementioned request for approval of an interim rate. On July 12, 2000, the Commission ordered that responses to these pleadings be filed by July 14, 2000.

5. On July 14, 2000, both AmerenUE and the Staff filed responses to MEG Interruptibles' pleadings, recommending that the Commission deny MEG Interruptibles' requests: 1) for approval of an interim alternative interruptible rate, 2) for oral argument on the interim rate, and 3) for an expedited schedule of proceedings. The Staff's response included, as an alternative, the following proposed procedural schedule, which was supported by AmerenUE.

Procedural Schedule

Direct testimony - MEG Interruptibles	July 31, 2000
Rebuttal testimony – all other parties	September 14, 2000
List of Issues, order of witnesses, order of cross	September 28, 2000
Surrebuttal/cross-surrrebuttal testimony – all parties	October 5, 2000
Statements of positions on the issues – all parties	October 11, 2000
Evidentiary Hearing	October 19-20, 2000

6. On July 27, 2000, in its Order Denying Motion for Oral Argument and Establishing Procedural Schedule, the Commission denied the three MEG Interruptibles requests noted in paragraph 5 herein, and adopted the above procedural schedule. Accordingly, the Staff hereby

submits, with the concurrence of all parties to this case, the following list of issues, order of witnesses, and order of cross-examination for the October 19-20, 2000 hearing concerning this matter. It is to be noted that although the hearing is scheduled for two days, the parties believe there is a high probability that only one day will be required to complete the hearing.

I. LIST OF ISSUES

A. Should the Commission order Union Electric Company to file tariff sheets to implement the interruptible rate concepts proposed by the MEG Interruptibles?

B. Should such interruptible rate provide for an average discount of $5.00 per kilowatt per month?

C. Should such interruptible rate explicitly provide for the number and cumulative hours of interruptions allowable?

D. Should such interruptible rate explicitly state the conditions under which interruptions may occur, and, if so, should those conditions be such that they are capable of being objectively verified?

II. ORDER OF WITNESSES

October 19, 2000[1]

A. MEG Interruptibles

1. Maurice Brubaker
2. Tom Rader
3. Don Schuette
4. David S. Dorris

B. AmerenUE

1. Richard J. Kovach

C. Staff

1. James C. Watkins

[1] All witnesses to appear one time for cross-examination on the entirety of their testimony

III. ORDER OF CROSS-EXAMINATION

A. MEG Interruptibles Witnesses

1. Public Counsel
2. Staff
3. AmerenUE

B. AmerenUE Witness

1. Public Counsel
2. Staff
3. MEG Interruptibles

C. Staff Witness

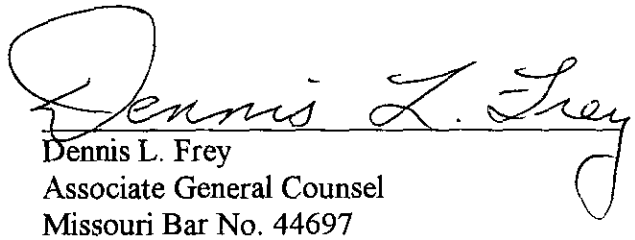
1. AmerenUE
2. Public Counsel
3. MEG Interruptibles

7. The Commission ordered the filing of the information herein by 3:00 on September 28, 2000. As a result of unforeseen difficulties in developing the list of issues, the document is being filed late. Staff hereby apologizes on behalf of all the parties to this proceeding for the late filing, and respectfully requests that the Commission accept this Proposed List of Issues, Order of Witnesses and Order of Cross-Examination out of time.

WHEREFORE, the Staff hereby submits this Proposed List of Issues, Order of Witnesses And Order of Cross-Examination, and respectfully moves that the Commission accept same out of time.

Respectfully submitted,

DANA K. JOYCE
General Counsel



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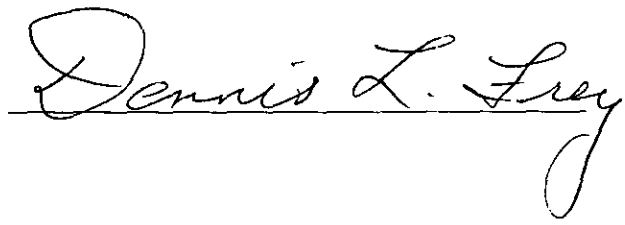
Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 29th day of September 2000.



Service List for
Case No. EO-2000-580
Revised: September 29, 2000

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