ROBERT C. JOHNSON
ATTORNEY AT LAW

720 OLIVE STREET, SUITE 2400, ST. LOUIS, MO 63101
TEL: (314) 345-6436 FAX: (314) 588-0638
bjohnson@bspmlaw.com

October 20, 2000

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Missouri Public Service Commission

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison St., Suite 100
P. O. Box 360
Jefferson City, Missouri 65102

RE: Union Electric Company – Case No. EO-2000-580

Dear Mr. Roberts:

On behalf of Holnam, Inc., et. al., I enclose herewith for filing, an original and eight (8) copies of the Response of the MEG Interruptibles to Union Electric Company Motion to Strike Position Statements of the MEG Interruptibles. An additional copy of the Response is enclosed with the request that same be file-stamped and returned to the undersigned in the enclosed self-stamped envelope.

I would appreciate your bringing this filing to the attention of the Commission.

Yours very truly,

Robert C. Johnson

RCJ/gmw
Enclosures

STLD01-816323-1

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

RESPONSE OF MEG INTERRUPTIBLES TO UNION ELECTRIC COMPANY MOTION TO STRIKE POSITION STATEMENTS OF THE MEG INTERRUPTIBLES

COME NOW Holnam, Inc., Lone Star Industries, Inc., and River Cement Company (the "MEG Interruptibles") and for their response to the Union Electric Company ("UE") Motion to Strike Position Statements, state as follows:

As noted by UE, the principal issue in this case is whether the Commission should implement the so-called Brubaker Concept Tariff ("Brubaker Tariff"). A review of the MEG Interruptibles position statements previously filed herein (copy attached) confirms that each is "simple and concise," not argumentative and each is directly related to the principal issue – whether to implement the Brubaker Tariff which provides for curtailment based upon system reliability grounds and upon economic grounds. These positions are supported, discussed or opposed in virtually all the pleadings and testimony previously filed herein.

Position Statements 2 and 4 state that reliability is an important factor to be reflected in an interruptible tariff and such factor is an important component of the Brubaker Tariff. The Brubaker Tariff in addition allows curtailments on economic grounds (of sixty-hours per year). System reliability as reflected in the Brubaker Tariff is an important position of the MEG Interruptibles on the issue of the Brubaker Tariff and to argue to the contrary is plain error and contrary to the facts and record in this case.

Position Statement 3 states the position of the MEG Interruptibles that the interruptible tariffs presently in effect on the Union Electric system are not adequate replacements for the former Rider 10M in so far as the MEG Interruptibles are concerned. This Position Statement is directly related to the Brubaker Tariff issue and, we submit, conforms to the language and concepts of the Commission's Procedural Order in this case.

Position Statement 5 iterates the position that failure to adopt a Brubaker Tariff for interruptible customers of Union Electric Company results in a discriminatory rate increase that is neither just nor reasonable.

Position Statement 6 asserts the position that the present Union Electric interruptible tariff Rider M bases curtailments on economic conditions which could result in off system sales of power that would ordinarily be delivered to native customers which we submit is contrary to Missouri regulatory policy and should be replaced by the Brubaker Tariff. This position has been continuously asserted throughout the proceedings in this matter.

Without belaboring the matter further, all position statements of the MEG Interruptibles are relevant to the issues, supported by testimony or pleadings and are consistent with the Commission Order herein.

The purpose of this proceeding as the style indicates is to investigate an alternative rate option for interruptible customers of Union Electric. Union Electric seeks to limit and restrict this Commission in its review and consideration of the issues and the positions of the parties. Any such attempt is improper, unfair and inconsistent with due process of law.

The Motion of UE to strike should be denied.

Dated at St. Louis, Missouri this 20th day of October 2000.

Respectfully submitted,

BY:

Robert C. Johnson #15755
Attorney for Applicants
720 Olive Street, Suite 2400
St. Louis, Missouri 63101
(314) 345-6436
(314) 588-0638 (Fax)

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing was mailed this 20[h] day of October 2000 to all parties of record.

Robert C. Johnson

10/11/00
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Missouri Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

POSITION STATEMENTS OF THE MEG INTERRUPTIBLES

COME NOW Holnam, Inc., Lone Star Industries, Inc., and River Cement Company ("MEG Interruptibles") and pursuant to the Commission's Procedural Order herein, submit herewith their Position Statements on the issues in this matter:

1. The Commission should require Union Electric to implement an Interruptible Tariff employing the concepts recommended by Maurice Brubaker.

2. Reliability considerations are an important factor in designing an Interruptible Tariff.

3. Existing Tariffs (Rate M and the voluntary curtailment Rider L) may be useable by some customers, but are not an adequate substitute for Rate 10M insofar as the cement companies are concerned.

4. Union Electric Company is short of capacity, and a reliability-based interruptible rate like Rate 10M, with the modifications proposed by the MEG Interruptibles can help UE meet its reliability requirements.

5. The termination of former Rate Schedule 10M resulted in an increase to the MEG Interruptibles, when compared to the firm rate, of approximately 2.4 million dollars – such increase is discriminatory, and is neither just nor reasonable.

STLD01-827543-1

(6) The present Interruptible Rate Schedule M permits curtailments for economic reasons contrary to Missouri regulatory policy.

Dated at St. Louis, Missouri this 10th day of October 2000.

Respectfully submitted,

BY: _______________

Robert C. Johnson #15755
Attorney for Applicants
720 Olive Street, Suite 2400
St. Louis, Missouri 63101
(314) 345-6436
(314) 588-0638 (Fax)

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing was mailed this 10th day of October 2000 to all parties of record.