WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
JEFFERSON CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
IRVINE, CALIFORNIA

BRYAN CAVE LLP

ONE METROPOLITAN SQUARE 211 NORTH BROADWAY, SUITE 3600 ST. LOUIS, MISSOURI 63102-2750

(314) 259-2000

FACSIMILE: (314) 259-2020

RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
SHANGHAI, PEOPLE'S REPUBLIC OF CHINA
IN ASSOCIATION WITH BRYAN CAVE,
A MULTINATIONAL PARTNERSHIP.

LONDON, ENGLAND

INTERNET ADDRESS
DMYUYLSTEKE@BRYANCAVE.COM

DIANA M. VUYLSTEKE

DIRECT DIAL NUMBER (314) 259-2543

October 1, 2001

By Hand Delivery

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65101

Re:

Case No. EO-2001-684

FILED³
0CT - 1 2001

Service Commission

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies each of the Missouri Industrial Energy Consumers' Motion to File Statement of Position Out of Time and Statement of Position in the above-referenced case.

Thank you for your assistance in bringing this filing to the attention of the Commission

Very truly yours,

Diana M. Vuylsteke

Sema Vuyletek

DMV:dv Enclosures

cc: All parties

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

RVICE COMMISSION F MISSOURI	OCT - 1 2001
9 6	Missouri public Cemmission
Case No. EO-2001-684	MISSION

In the Matter of the Application of)
Union Electric Company (d/b/a)
AmerenUE) for an Order Authorizing)
it to Withdraw from the Midwest ISO)
to Participate in the Alliance RTO)

MISSOURI INDUSTRIAL ENERGY CONSUMERS' MOTION TO FILE STATEMENT OF POSITION OUT OF TIME

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Holnam, Hussmann Refrigeration, ISP Minerals, Mallinckrodt, Inc., MEMC Electronic Materials, Monsanto Company, Precoat Metals, Procter & Gamble Manufacturing, Ralston Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and files its *Motion to File Statement of Position Out of Time*. The MIEC's *Statement of Position* is filed herewith. In support of its Motion, the MIEC states as follows:

- 1. The Commission's Order Establishing Procedural Schedule in this case required the parties to file their List of Issues, Order of Witnesses and Order of Cross Examination in this case on September 26th, 2001, but was filed out of time on September 28th.
- 2. The Commission's Order required *Statements of Position* to be filed on September 28th.
- 3. The MIEC had difficulty preparing its Position Statement by September 28th because the *List of Issues* was not finalized until September 28th.

WHEREFORE, the MIEC respectfully requests that the Commission permit it to file its Statement of Position out of time. Respectfully submitted,

BRYAN CAVE, LLP

Diana M. Vuylsteke, #42419

211 N. Broadway, Suite 3600

St. Louis, Missouri 63102

Telephone: (314) 259-2543 Facsimile: (314) 259-2020

E-mail: dmvuylsteke@bryancave.com

Juanie Vingloteke

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the attached service list this 1st day of October, 2001.