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May 21, 2001

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P. O. Box 360
Jefferson City, MO 65102

FILED²

MAY 21 2001

Missouri Public
Service Commission

RE: Case No. GR-2000-579

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO CONSOLIDATE**.

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,

Lera L. Shemwell
Associate General Counsel
(573) 751-7431
(573) 751-9285 (Fax)

LLS:sw
Enclosure
cc: Counsel of Record

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

FILED²

MAY 21 2001

Missouri Public
Service Commission

In the matter of Union Electric)
Company d/b/a AmerenUE's Gas)
Adjustment factors to be reviewed in its)
1999-2000 Actual Cost Adjustment.)

Case No. GR-2000-579

MOTION TO CONSOLIDATE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission
("Commission") in the above-captioned matter and for its Motion to Consolidate states:

1. Union Electric Company d/b/a AmerenUE ("Company") filed a tariff sheet on October 16, 2000, proposed to be effective November 1, 2000. The filing was made to reflect changes in Company's Purchased Gas Adjustment ("PGA") factors for the upcoming winter season.
2. On October 25, 2000, the Commission issued its Order Approving Interim Rates, which rates are subject to refund.
3. In order to accelerate the review process of the 2000-2001 Actual Cost Adjustment audit, Staff proposes to combine review of the Company's 1999-2000 Actual Cost Adjustment in Case No. Gr-2000-579 with the Company's 2000-2001 Actual Cost Adjustment in Case No. GR-2001-488.
4. If the Commission approves this Motion to Consolidate, a Procedural Schedule will be proposed for the combined cases.
5. Commission Rule 4 CSR 240-2.110(3) provides for consolidation of cases when related questions of law or fact are involved:

When pending actions involve related questions of law or fact, the commission May order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay.

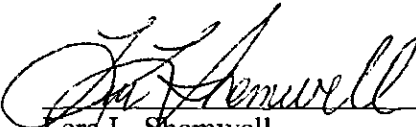
6. Case Nos. GR-2000-579 and GR-2001-488 involve the same questions of law and closely related questions of fact.

7. AmerenUE has indicated that it will not oppose this request. The Office of the Public Counsel also does not oppose this request.

WHEREFORE, the Staff recommends that the Commission approve the proposed the Motion to Consolidate these cases.

Respectfully submitted,


DANA K. JOYCE
General Counsel


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Associate General Counsel
Missouri Bar No. 43792

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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 21st day of May, 2001.



Service List for
Case No. GR-2000-579
Revised: May 21, 2001 (SW)

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