

State of Missouri

Martha S. Hogerty Public Counsel Mel Carnahan Governor

Office of the Public Counsel

Harry S Truman Building - Ste. 250 P.O. Box 7800 Jefferson City, Missouri 65102 Telephone: 314-751-4857 Facsimile: 314-751-5562 Relay Missouri 1-800-735-2966 TDD 1-800-735-2466 Voice

June 3, 1996

Mr. David Rauch Executive Secretary Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Union Electric Company Case No. EM-96-149

Dear Mr. Rauch:

Enclosed for filing in the above-referenced case please find the original and fourteen copies of Public Counsel's **Motion to Late File Testimony**. I have on this date mailed or hand-delivered copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely wis R. Mills, Jr. Deputy Public Counsel

LRM:bjr

Enclosures

IFIILIEID JUN 3 - 1996 PUBLIC SERVICE COMMISSION

cc: Counsel of Record

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BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the matter of the application of Union Electric Company for an order authorizing: (1) certain merger transactions involving Union Electric Company; (2) the transfer of certain assets, real estate, leased property, easements and contractual agreements to Central Illinois Public Service Company; and (3) in connection therewith, certain other related transactions.

Case No. EM-96-149 TRITLIRID JUN 3 PUBLIC SERVICE COMMISSION STIMONY

MOTION TO LATE FILE TESTIMONY

COMES NOW The Office of the Public Counsel ("Public Counsel") and for its Motion to Late File Testimony states as follows:

1. Public Counsel once again has had problems printing proprietary and highly

confidential versions of testimony. As a result, the Cross-Surrebuttal testimony of Ryan Kind was filed late.

2. Public Counsel does not believe that this slight delay will inconvenience any of the parties or the Commission.

WHEREFORE, Public Counsel respectfully requests that the Commission allow Public Counsel to late file the Cross-Surrebuttal testimony of Ryan Kind.

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Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL By Lewis R. Mills, Jr. (#3527\$) **Deputy Public Counsel** P. O. Box 7800

Jefferson City, MO 65102 (573) 751-4857

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following on this 30 day of 1996:

Steve Dottheim Deputy General Counsel Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Richard W. French French & Stewart 1001 Cherry St., Suite 302 Columbia, MO 65201

Gary W. Duffy Brydon, Swearengen & England P. O. Box 456 Jefferson City, MO 65102

Robert C. Johnson Diana M. Schmidt Peper, Martin, Jensen, et al. 720 Olive St., 24th Floor St. Louis, MO 63101-2396 James J. Cook Joseph H. Raybuck Union Electric Company P. O. Box 149 (M/C 1310) St. Louis, MO 63166

James C. Swearengen Brydon, Swearengen & England P. O. Box 456 Jefferson City, MO 65102

Michael C. Pendergast Laclede Gas Company 720 Olive St., Room 1520 St. Louis, MO 63101

Susan B. Cunningham Staff Attorney Kansas City Power & Light Co. P. O. Box 418679 Kansas City, MO 64141-9679

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Jeremiah W. Nixon Daryl R. Hylton Office of the Attorney General P. O. Box 899 Jefferson City, MO 65102

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James M. Fischer Attorney at Law 101 West McCarty, Ste. 215 Jefferson City, MO 65101

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Paul S. DeFord Lathrop & Norquist 2345 Grand Blvd., Suite 2500 Kansas City, MO 64108

Marilyn S. Teitelbaum Schuchat, Cook & Werner 1221 Locust St., 2nd Floor St. Louis, MO 63101