

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of the application )  
of Union Electric Company for )  
permission and authority to )  
construct, operate and maintain )  
two combustion turbine generating )  
units in the State of Missouri )

Case No. EA-79-119

MOTION FOR ORDER REQUIRING FILING OF PREPARED TESTIMONY

Comes now the Staff of the Public Service Commission (Staff), by and through its attorneys, and respectfully requests that the Commission issue an Order requiring Union Electric Company (the Applicant), before calling any witnesses to testify at the hearing set in this matter, to file prepared testimony for any such witness by March 12, 1979. In support of its Motion, Staff states the following:

1. That it has come to the attention of the Staff that the testimony in this matter is of a complex nature;
2. And that in order to expedite this matter on the hearing date set by the Commission, the Staff will also file prepared testimony and requests that its prefiled testimony be accepted on March 16, 1979;
3. That the Applicant was contacted in this matter and fully agrees that such dates are acceptable and that prefiled testimony will more clearly draw the issues to expedite the hearing in this matter.

WHEREFORE, Staff moves this Commission to issue an Order requiring Applicant to file prepared testimony for any witness to be called to testify at the hearing set in this matter. The Staff further moves that such testimony be filed by March 12, 1979, in order to give Staff opportunity to review such testimony.

Respectfully submitted,

Paul W. Phillips  
General Counsel



*Treva J. Laska*  
Treva J. Laska, Assistant General Counsel  
Attorneys for Missouri Public  
Service Commission  
Jefferson State Office Building  
100 East Capital Avenue  
Jefferson City, Missouri 65102