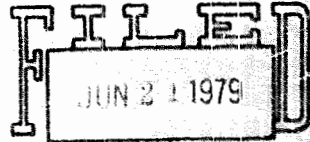


BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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 ORAL ARGUMENT

PUBLIC SERVICE COMMISSION

Comes now the General Counsel's Office of the Public Service Commission (Commission) and pursuant to 4CSR 240-2.80 respectfully requests the Commission to grant this motion for oral argument in the above-captioned matter. The General Counsel's Office offers the following to support its motion for oral argument.

1. On November 20, 1978, Union Electric Company (Company) filed an application with the Commission seeking approval to build two 50 MW combustion turbines in order to provide electric service to its customers.

2. The Commission set this matter for a hearing which was held on March 27, 1979, in the Commission's hearing room on the tenth floor of the Jefferson State Office Building, Jefferson City, Missouri.

3. On May 4, 1979, the General Counsel's Office filed a motion to dismiss this matter (1) for failure to file such application in a timely manner and (2) because the application for a certificate of convenience and necessity as set forth in Section 393.170 RSMo 1969 was improper and unnecessary.

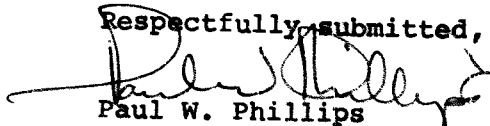
4. On May 25, 1979, the Company filed its answer to this motion.

5. Because of the unresolved issues in this matter, the General Counsel requests the opportunity to pursue the case further by oral argument before the Commission in order to clearly

delineate the issues and to expedite this matter and avoid any further delay.

WHEREFORE, the General Counsel respectfully requests that this motion for oral argument in this matter be granted.

Respectfully submitted,


Paul W. Phillips
General Counsel


Treva J. Hearne
Assistant General Counsel

CERTIFICATE OF SERVICE

THE UNDERSIGNED certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties of the above cause by enclosing the same in an envelope addressed to such attorneys at their business address as disclosed by the pleadings of record herein with postage fully prepaid, and by depositing said envelopes in the United States mail at Jefferson City Missouri this 21 day of June 19 79

Attorneys for the Public Service
Commission of the State of Missouri
P.O. Box 360
Jefferson City, Missouri 65102

