

ROBERT C. JOHNSON
ATTORNEY AT LAW

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101
TEL: (314) 345-6436 FAX: (314) 588-0638
bjohnson@bspmlaw.com

April 18, 2000

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
501 West High Street, Suite 530
Jefferson City, MO 65102

FILED²
APR 19 2000
Missouri Public
Service Commission


Re: MOPSC Case No. ET-2000-666
Tariff File No. 200000913

Dear Mr. Roberts:

Enclosed for filing on behalf of Holnam Inc. et al in the above matter please find an original and fifteen (15) copies of the Motion to Suspend Tariff, previously filed by Union Electric Company and identified as Tariff File No. 200000913, together with an original and fifteen (15) copies of a Motion to Consolidate of Holnam, Inc. et al, which requests that the Commission consolidate the above tariff matter with case no. EO-2000-580, previously filed by Holnam, Inc. et al.

I would appreciate you bringing this filing to the attention of the Commission and also returning one file stamped copy of each of the enclosures to the undersigned in the enclosed stamped self-addressed envelopes.

Yours very truly,


Robert C. Johnson

Enclosure
cc: Maurice Brubaker

FILED²

APR 19 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company's)	
Tariff Sheets to Revise Rates for Interruptible)	Case No. ET-2000-666
Customers of Union Electric Company)	Tariff File No. 200000913

MOTION TO SUSPEND TARIFF

Holnam, Inc., Lone Star Industries Inc., and River Cement Company ("MEG Interruptibles") hereby object to and move this Commission to suspend the tariff issued by Union Electric Company ("UE") on April 6, 2000 to become effective May 6, 2000, identified by UE as "Rider M Option Based Curtailment Rider" and filed with the Commission as Tariff File No. 200000913 (the "UE Curtailment Tariff"), and in support of this motion state as follows:

1. The MEG Interruptibles are all engaged in the manufacture of cement in various locations in eastern Missouri. They have been interruptible customers of UE for many years and have designed their manufacturing processes to operate on a basis that permits electric power interruption when necessitated by utility reliability problems pursuant to interruptible service tariffs in effect for many years.
2. The MEG Interruptibles protest and object to the proposed Curtailment Tariff and request the opportunity to present their protests and objections in an evidentiary proceeding before this Commission.
3. In connection with the settlement of various issues in docket number EO-96-15, and execution of the related Stipulation and Agreement dated April 30, 1999, UE insisted on implementation of a new curtailment tariff under which curtailments were largely keyed to economic conditions, rather than reliability concerns. Also under the

terms of the aforesaid Stipulation and Agreement, the MEG Interruptibles were granted the right to initiate a proceeding to consider an alternative rate option for interruptible customers of UE. After unsuccessful negotiations with UE, the MEG Interruptibles exercised such right and on March 20, 2000 filed their Application to Initiate a Docket for Consideration of an Alternative Rate Option for Interruptible Customers of Union Electric Company and for Approval of an Alternative Interruptible rate (the "Application). Said Application is now pending before this Commission as case number EO-2000-580.

4. On or about April 6, 2000, UE filed the UE Curtailment Tariff, which established terms and conditions for curtailment of service to the MEG Interruptibles, which are substantially different than the terms and conditions of the proposal of the MEG Interruptibles and also UE's own curtailment tariffs in effect for many years prior to June 1, 1999.

5 In the March 20, 2000 filing by the MEG Interruptibles, they requested that the Commission approve implementation of a new alternative curtailment tariff on an interim basis during the pendencies of these proceedings. Approval by the Commission of the interim tariff would permit the Commission, its Staff and all parties to obtain the best evidence of the fairness and reasonableness of the proposed interim tariff in the coming summer months. Under these circumstances the MEG Interruptibles submit that it would be inappropriate to permit UE's proposed Curtailment Tariff to go into effect as the utility has requested.

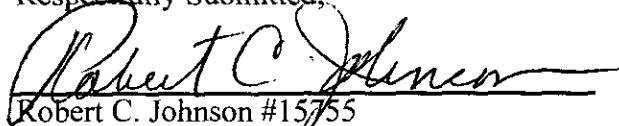
6 The issues involved in the proceeding previously filed by the MEG Interruptibles and the Curtailment Tariff filing by UE are substantially the same and accordingly the

MEG Interruptibles concurrently with the filing of this motion are filing motions to consolidate both proceedings for hearing before this Commission. The granting of this motion and the motions to consolidate will simplify the hearing of the issues in these matters and expedite the resolution of differences among the parties.

WHEREFORE, the MEG Interruptibles request that the Commission grant this motion to suspend the Curtailment Tariff filed by UE, and establish a schedule of proceedings for hearing of the issues in this and related matters.

Dated at St. Louis, Missouri this 18th day of April 2000.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert C. Johnson", is written over a horizontal line.

Robert C. Johnson #15755
720 Olive St. Suite 2400
St. Louis, MO 63101
(314) 345-6436
(314) 588-0638 (fax)

ATTORNEY FOR MEG
INTERRUPTIBLES

CERTIFICATE OF SERVICE

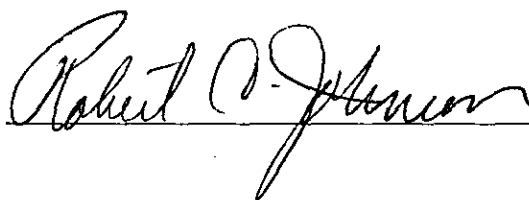
I hereby certify that a true and correct copy of the foregoing has been mailed or hand delivered to the following on this 18th day of April 2000

James J. Cook
Ameren Services Company
One Ameren Plaza
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63146-6149

General Counsel
Missouri Public Service Commission
Truman Building
301 West High Street, 7-N
Jefferson City, MO 65101

Steven Dottheim
Deputy General Counsel
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
Truman Building
301 West High Street, Room 250
Jefferson City, MO 65101

A handwritten signature in cursive script, reading "Robert O. Johnson", written over a horizontal line.