

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the application)
of Union Electric Company for a)
variance from provisions of)
Commission Rule 4 CSR 240-14)
to meet unregulated competition)
in a subdivision in the City of)
Linn, Osage County, Missouri.)

Case No. E0-96-431

MOTION FOR EXPEDITED TREATMENT
WITH REGARD TO APPLICATION FOR VARIANCE

COMES NOW Union Electric Company ("UE"), by and through its counsel, and for its motion states as follows:

1. Pursuant to Commission Rules 4 CSR 240-2.060 and 4 CSR 240-14.010 (2) and UE's tariff entitled "Unregulated Competition Waivers", Schedule of Rates For Electricity, Schedule No. 5, Sheet No. 202, UE has filed concurrently with this Motion its Application for a variance from the Commission's Utility Promotional Practices Rule 4 CSR 240-14 and from certain UE tariffs.

2. UE files its Application for a variance to allow it to meet unregulated competition from Three Rivers Electric Cooperative ("Cooperative") and not to meet competition from another regulated supplier. Such competition, by its very nature, is unrestrained, and UE needs the flexibility to respond to offers made by Cooperative. If UE is unable to promptly respond to the subdivision developer, it fears that the developer will make a decision to take Cooperative's service in order to proceed with the subdivision.

FILED

JUN 12 1996

MISSOURI
PUBLIC SERVICE COMMISSION

3. UE requests this expedited decision, understanding that it will have the burden of proof in a subsequent rate proceeding if it seeks to recover its investment from its ratepayers.

4. UE waives any requirement for an order with an effective date ten days after the issuance of the order.

WHEREFORE, UE requests an expedited order of the Commission.

Respectfully submitted,

UNION ELECTRIC COMPANY

By



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Dated: _____

6-11-96

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first-class U.S. mail, postage prepaid, on this 11th day of JUNE, 1996, on the following public utilities and the Office of the Public Counsel.



Ronald K. Evans

Citizens Electric Corporation
150 Merchant Street
P.O. Box 311
Ste. Genevieve, MO 63670

Empire District Electric
Company
602 Joplin Street
P.O. Box 127
Joplin, MO 64802

Kansas City Power & Light
Company
1201 Walnut
P.O. Box 418679
Kansas City, MO 64141

Missouri Public Service
10700 East 350 Hwy.
Box 11739
Kansas City, MO 64138

St. Joseph Light & Power
Company
520 Francis Street
P.O. Box 998
St. Joseph, MO 64502

Southern Missouri Gas Company,
LP
8801 So. Yale, Suite 385
Tulsa, OK 74137

Associated Natural Gas Company
1001 Sain Street
P.O. Box 3578
Fayetteville, AR 72702

Fidelity Natural Gas, Inc.
64 North Clark
P.O. Box 669
Sullivan, MO 63080

Greeley Gas Company
Div. of Athos Energy Corp.
1301 Pennsylvania Street
Suite 800
Denver, CO 80203

Laclede Gas Company
720 Olive Street
St. Louis, MO 63101

Missouri Gas Company
10700 East M350 Highway
Kansas City, MO 64138

Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111

Missouri Pipeline Company
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