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February 23, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building; 200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

FEB 2 7 2001

Missouri Public Service Commission

Re: Case

Case No.: EO-2000-580 – Investigation Into an Alternative Rate Option for Interruptible Customers of Union Electric Company d/b/a AmerenUE

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) copies of the MEG Interruptibles Motion for Oral Argument. I would appreciate your file stamping the one of the copies and returning it to me in the enclosed envelope.

Thank you for your assistance in this matter.

Sincerely,

Lisa C. Langeneckert

Gangeneckert

gmw

Enclosures (10)

cc/enc: Mr. Maurice E. Brubaker All Counsel of Record

STLD01-852397-1

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI In the Matter of an Investigation Into an Alternative Rate Option for Interruptible Customers of Union Electric Company d/b/a/ AmerenUE DESCRIPTION FEB 27 2001 Case No. EO-2000-580 Case No. EO-2000-580

MEG INTERRUPTIBLES MOTION FOR ORAL ARGUMENT

MEG Interruptibles ("MEG"), Holnam, et al, moves the Public Service Commission ("Commission") for the opportunity to present oral argument. In support of this Motion the MEG Interruptibles state as follows:

- 1. In this case, both the legal and the factual issues are complex and it will assist the Commission in this case by granting oral argument
- 2. This case presents a very important and timely issue because U.E. is, by its own admission, short on capacity; and all customers of the utility could be affected by this power shortage and lack of system reliability.
- 3. A review of the briefs filed in this case indicates that there is confusion with regard to the basic facts in this case and particularly with regard to the Brubaker Tariff.
- 4. The granting of this Motion for Oral Argument will not adversely impact any party.

WHEREFORE, the MEG Interruptibles request the opportunity to present oral argument on the critical issues involved in this case.

Dated: February 23, 2001

Respectfully submitted,

Robert C. Johnson

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing has been mailed or hand-delivered to the following on this 23rd day of February 2001.

Gangenecker

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge P.O. Box 360 Jefferson City, MO 65102

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