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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

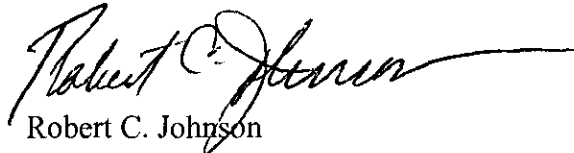
Re: MOPSC Case No. EO-2000-580

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 a Motion to Consolidate, which requests that the Commission consolidate the above case with the case to be established in connection with the filing of Union Electric Company tariff of Rider M identified as Tariff File No. 200000913.

I will appreciate you bringing this filing to the attention to the Commission and also returning to the undersigned a file stamped copy thereof in the enclosed self-addressed envelope.

Yours very truly,


Robert C. Johnson

Enclosure
cc: Maurice Brubaker

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

APR 19 2000

Missouri Public
Service Commission

In the Matter of an Investigation)
Into an Alternative Rate Option for)
Interruptible Customers of Union)
Electric Company d/b/a Ameren UE)

Case No. EO-2000-580

MOTION TO CONSOLIDATE

Holnam Inc., Lone Star Industries, Inc. and River Cement Company ("MEG Interruptibles") move the Commission to consolidate this case and all proceedings herein with the case to be established in connection with the filing by Union Electric Company ("UE"), of the tariff identified as Rider M Option Based Curtailment Rider with this Commission on or about April 5, 2000 and identified as Tariff File No. 200000913 (the "UE Curtailment Tariff").

In support of this Motion, the MEG Interruptibles state as follows:

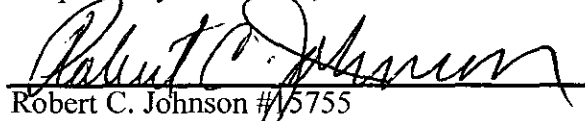
1. On March 20, 2000 the MEG Interruptibles, pursuant to the Stipulation and Agreement executed on April 30, 1999 in docket number EO-96-15, filed their Application to Initiate a Docket for Consideration of an Alternative Rate Option for Interruptible Customers of Union Electric Company and for Approval of an Interim Alternative Interruptible Rate. Among other things, the MEG Interruptibles proposed the terms and conditions of an alternative interruptible rate and asked the Commission to approve a tariff reflecting such terms and conditions on an interim basis.
2. On or about April 5, 2000, UE filed with this Commission, the UE Curtailment Tariff, which reflects terms and conditions substantially different from the terms and conditions of the tariff proposal filed by the MEG Interruptibles. Concurrently herewith,

the MEG Interruptibles are filing their Motion to Suspend the UE Curtailment Tariff and a request for a full hearing thereon. Accordingly, it appears that there will now be two matters pending before this Commission involving essentially curtailment and interruptible issues for customers of UE.

3. This docket and the docket to be established in response to the filing by UE of the UE Curtailment Tariff both involve curtailment and interruptible rate issues and the same principle parties. Accordingly, the granting of this Motion to Consolidate will simplify proceedings and, we submit, expedite a resolution of the issues herein.

WHEREFORE, the MEG Interruptibles request that this Commission consolidate this case and all proceedings herein with the case to be established pursuant to the Rider M Curtailment Tariff previously filed by Union Electric Company and that the issues in these cases be heard by the Commission on a consolidated basis.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

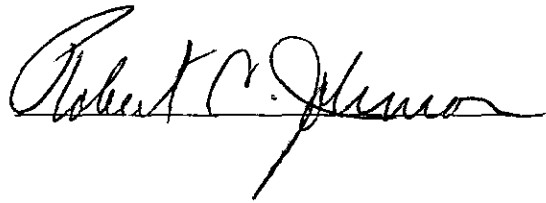
I hereby certify that a true and correct copy of the foregoing has been mailed or hand delivered to the following on this 18th day of April 2000

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