

FILED

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Union Electric Company's)
Tariff Sheets to Revise Rates for Interruptible)
Customers of Union Electric Company)

Case No. ET- 2000-666
Tariff File No. 200000913

MOTION TO CONSOLIDATE

Holnam Inc., Lone Star Industries, Inc. and River Cement Company ("MEG Interruptibles") move the Commission to consolidate the case in this docket 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") with case number EO-2000-580, previously filed with the Commission by the MEG Interruptibles.

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. Accordingly, it appears that there will now be two matters pending before this Commission involving 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 for customers similarly situated 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 case number EO-2000-580 previously filed by the MEG Interruptibles and that 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 19th day of April 2000

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