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February 24, 2003

BY HAND DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
St. Louis, Missouri 65101

Re: Case No. EO-2003-0271

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copies each of the Missouri Industrial Energy Consumers' Application to Intervene and Response to the Procedural Schedule Proposed by Union Electric Company.

Please "file-stamp" the additional copies.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Diana M. Vuylsteke

DMV:rms
Enclosures

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**Missouri Public
Service Commission**

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In re: Application of Union Electric)
Company For Authority to Participate) Case No. EO-2003-0271
in the Midwest ISO through a Contractual)
Relationship with GridAmerica)

**RESPONSE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS
TO THE PROCEDURAL SCHEDULE PROPOSED BY UNION ELECTRIC COMPANY**

Comes now Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, DaimlerChrysler, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, Monsanto Company, Pharmacia, Precoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and, pursuant to the Commission's February 14 order in this case, files its response to the procedural schedule proposed by Union Electric Company ("UE") on February 13. For its response, the MIEC states as follows:

1. The MIEC opposes the schedule proposed by UE for these proceedings. UE's proposed schedule fails to allow sufficient time for discovery by the parties and fails to allow the parties sufficient time for preparation of rebuttal and surrebuttal testimony. UE's proposed schedule in effect curtails the due process rights of the parties to have a full and fair opportunity to present their cases.
2. The MIEC supports the alternative schedule proposed by the Commission Staff.

WHEREFORE, the MIEC requests that the Commission reject the procedural schedule proposed by UE and adopt the alternative schedule proposed by the Commission Staff herein.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all parties on the Commission's service list by first class United States Mail this 24th day of February, 2003.

Diana M. Vuylsteke