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Missouri Public Service Commission

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July 30, 1999

GORDON L. PERSINGER **Acting Executive Director** Director, Research and Public Affairs

> WESS A. HENDERSON **Director, Utility Operations**

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Case No. EA-2000-37

FILED

JUL 3 0 1999

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of STAFF'S RESPONSE TO COMMISSION ORDER.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Dennis L. Frey

Assistant General Counsel

(573) 751-8700

(573) 751-9285 (Fax)

DLF/slr Enclosure

cc: Counsel of Record

OF THE STATE OF MISSOURI

Solving Commission

Solving Commission

Of The State of Missouri

In the Matter of the Application of Union	
Electric Company, d/b/a AmerenUE, for	
approval of the Transfer of Generating	
Assets by an Affiliate to Another Affiliate	

Case No. EA-2000-37

STAFF'S RESPONSE TO COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission (Staff) in response to the Missouri Public Service Commission's (Commission) Order Directing Filing dated July 27, 1999. The Commission directed the Staff to file on or before July 30, 1999 its response to Union Electric Company's Motion for Expedited Treatment, and to state in its response the earliest date on which it believes it will be able to recommend whether or not the relief sought by UE should be granted. In response to the Commission Order Directing Filing, the Staff states as follows:

1. The Staff hereby requests that the Commission schedule an early prehearing conference, to convene as soon as possible after the close of the intervention period on August 16, 1999, that the Commission already has set, for the purpose of setting a procedural schedule. The Joint Dispatch Agreement referred to and addressed in Union Electric Company's (UE) Application For Findings Pursuant To 15 U.S.C.A. §79z-5a(c) is a document that was a material matter in the Staff's consideration of UE's application in Case No. EM-96-149 for Commission authorization to merge with CIPSCO, Inc. Changes in that document and changes

in UE's capacity expansion plans are material matters that the Staff believes it needs to address in its consideration of UE's July 19, 1999 Application.

2. The Staff has commenced discussions with UE regarding its filing in the instant case, and has already requested from UE the detailed information needed to perform a comprehensive review. Thus, in asking that the Commission order the convening of an early prehearing conference to occur shortly after the close of the aforementioned intervention period set by the Commission, the Staff does not intend to indicate that it will do nothing in this proceeding until an early prehearing conference occurs. The Staff is working to expedite its review of UE's Application; however, because it has not yet received the detailed information from UE, Staff cannot at this time provide a credible estimate as to when it is likely to complete its review.

WHEREFORE, for the above stated reasons, the Staff requests that the Commission schedule an early prehearing conference for the purpose of submitting a procedural schedule in the instant case.

Respectfully submitted,

DANA K. JOYCE General Counsel

Dennis L. Frey

Assistant General Counsel Missouri Bar No. 44697

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-8700 (Telephone) (573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 30th of July 1999.

Service List for Case No. EA-2000-37

Revised: July 30, 1999

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