

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED²
DEC 09 2002
Missouri Public
Service Commission

Zoltek Corporation,)	
)	
Petitioner,)	
)	
vs.)	Case No. EC-2001-345
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
)	
Respondent.)	

PETITIONER'S APPLICATION FOR REHEARING

COMES NOW Petitioner, by and through its attorneys, and for its Application for Rehearing pursuant to Section 386.500 of the Revised Statutes of Missouri states as follows:

1. On or about November 26, 2002, the Public Service Commission ("PSC") issued its Report and Order in regard to the above matter.
2. As part of its Order, the PSC found that Respondent's service to Petitioner did not violate Regulation 4 CSR 240-10.030(23)(D).
3. As part of its Order, the PSC concluded that the electric service supplied by Respondent to Petitioner was both safe and adequate for all of the years at issue.
4. The findings of the PSC with respect to Regulation 4 CSR 240-10.030(23)(D) were unjust in that Petitioner provided clear and convincing evidence at the trial of this matter indicating that there were twenty-seven (27) instances noted during the monitoring periods between 1993 and 2000 where the voltage fell into the "extreme zone." During the 2000 monitoring, Union Electric recorded voltage drops of 15%, 17%, 20% and 35%. (Tr. 495-497).


5. The findings of the PSC with respect to Regulation 4 CSR 240-10.030(23)(D) were unlawful in that the PSC added a one-minute measurement requirement that is clearly not applicable to the service provided by Respondent to Petitioner.

6. The findings of the PSC with respect to the safety and quality of the service supplied by Respondent to Petitioner was unreasonable in light of the evidence produced at the trial of this matter by Petitioner demonstrated that over 270 service quality incidents were recorded between 1993 and 2001.

WHEREFORE, Petitioner respectfully requests that the Public Service Commission grant Petitioner's Application for Rehearing, set this matter for a rehearing and for such other and further relief as the Public Service Commission deems appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Signature above is also certification that a true and correct copy of the above and foregoing document has been mailed, postage prepaid, this 6th day of December, 2002, to:

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