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October 10, 2000

VIA FEDERAL EXPRESS

FILED²
OCT 11 2000
Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102-0360

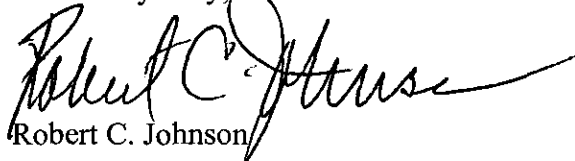
Re: Union Electric Interruptible Tariff Matter – Case No. EO-2000-580

Dear Mr. Roberts:

On behalf of Holnam, Inc., et. al., I enclose herewith an original and eight (8) copies of the MEG Interruptibles Position Statements for filing in the above-referenced case pursuant to the Procedural Order entered by the Commission herein.

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

RCJ/gmw

Enclosure

cc: Jim Cook (w/enc.)
John Coffman (w/enc.)
Dennis Frey (w/enc.)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
OCT 11 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 AmerenUE

Case No. EO-2000-580

POSITION STATEMENTS OF THE MEG INTERRUPTIBLES

COME NOW Holnam, Inc., Lone Star Industries, Inc., and River Cement Company ("MEG Interruptibles") and pursuant to the Commission's Procedural Order herein, submit herewith their Position Statements on the issues in this matter:

1. The Commission should require Union Electric to implement an Interruptible Tariff employing the concepts recommended by Maurice Brubaker.
2. Reliability considerations are an important factor in designing an Interruptible Tariff.
3. Existing Tariffs (Rate M and the voluntary curtailment Rider L) may be useable by some customers, but are not an adequate substitute for Rate 10M insofar as the cement companies are concerned.
4. Union Electric Company is short of capacity, and a reliability-based interruptible rate like Rate 10M, with the modifications proposed by the MEG Interruptibles can help UE meet its reliability requirements.
5. The termination of former Rate Schedule 10M resulted in an increase to the MEG Interruptibles, when compared to the firm rate, of approximately 2.4 million dollars – such increase is discriminatory, and is neither just nor reasonable.

(6) The present Interruptible Rate Schedule M permits curtailments for economic reasons contrary to Missouri regulatory policy.

Dated at St. Louis, Missouri this 10th day of October 2000.

Respectfully submitted,

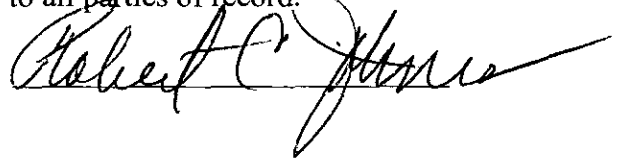
BY:

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

Robert C. Johnson #15755
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(314) 588-0638 (Fax)

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing was mailed this 10th day of October 2000 to all parties of record.

A handwritten signature in black ink, appearing to read "Robert C. Jones", written over a horizontal line.