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March 26, 1997

FILED

MAR 31 1997

PUBLIC SERVICE COMMISSION

Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

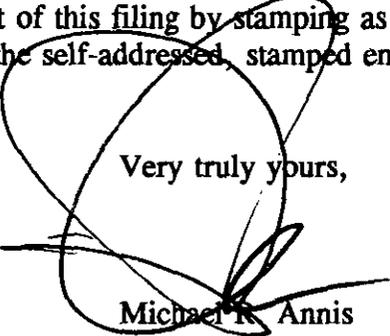
RE: *Union Electric/Central Illinois Public Service Company Merger*
Case No. EM-96-149

Dear Mr. Wright:

Enclosed for filing on behalf of the Missouri Industrial Energy Consumers in the above-referenced matter are an original and 14 copies of the Missouri Industrial Energy Consumers' Response to Applicant's Motion for Extension of Time in Which to File Experimental Retail Wheeling Pilot Program.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the self-addressed, stamped envelope enclosed for your convenience.

Very truly yours,


Michael R. Annis

MRA:caw

Enclosures

cc: Office of Public Counsel
Counsel of Record
James J. Cook, Union Electric Company

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 31 1997

PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION)
OF UNION ELECTRIC COMPANY FOR AN)
ORDER AUTHORIZING: (1) CERTAIN)
MERGER TRANSACTIONS INVOLVING)
UNION ELECTRIC COMPANY; (2) THE)
TRANSFER OF CERTAIN ASSETS, REAL)
ESTATE, LEASED PROPERTY,)
EASEMENTS AND CONTRACTUAL)
AGREEMENTS TO CENTRAL ILLINOIS)
PUBLIC SERVICE COMPANY; AND (3))
IN CONNECTION THEREWITH, CERTAIN)
OTHER RELATED TRANSACTIONS.)

Case No. EM-96-149

**MISSOURI INDUSTRIAL ENERGY CONSUMERS' RESPONSE
TO APPLICANT'S MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE EXPERIMENTAL RETAIL WHEELING PILOT PROGRAM**

COMES NOW, the Missouri Industrial Energy Consumers ("MIEC"), by and through its attorneys, and in response to Applicant's Motion for Extension of Time in Which to File Experimental Retail Wheeling Pilot Program ("Experimental Pilot Program"), states as follows:

1. Parties to the merger proceeding entered into a stipulation and agreement ("Stipulation") on July 12, 1996 which included the commitment by Union Electric Company ("UE") that it would propose and file with the Commission Experimental Retail Wheeling Pilot Program available to all major classes of Missouri retail electric customers "as soon as practical, but no later than March 1, 1997".

2. On February 21, 1997, the Missouri Public Service Commission issued its Report and Order approving UE's application in this docket. The Report and Order became final on

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March 4, 1997. In the Report and Order, the Commission stated that it would entertain a motion to modify the original due date for filing the Experimental Pilot Project to allow UE the opportunity to obtain input on the Program from interested parties.

3. On March 13, 1997, UE filed with this Commission a Motion for Extension of Time in Which to File the Experimental Retail Wheeling Pilot Program seeking an extension of the deadline "until no later than September 1, 1997."

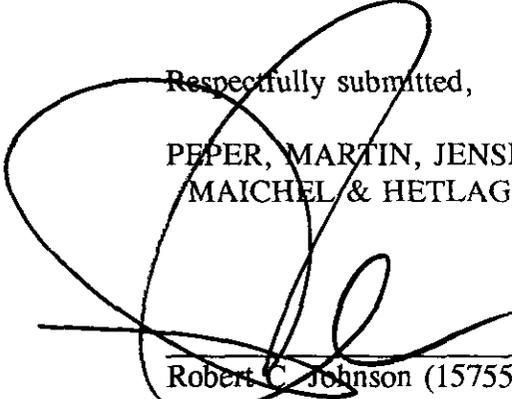
4. The MIEC believe that all parties to this docket should be allowed to provide "substantive input" to the Experimental Pilot Program as is provided in the Stipulation and Agreement. However, the MIEC do not believe that an extension of six months from the original date agreed upon by the parties to the Stipulation is warranted.

5. A significant amount of the necessary approval process for consummation of the UE/Central Illinois Public Service Company merger has been undertaken since the date the parties to this docket entered into the Stipulation. Therefore, UE has the present ability to focus its attention upon the procuring of input from the parties to this docket in order to prepare and file the Experimental Retail Wheeling Pilot. This "substantive input" should be completed within 90 days, or before July 1, 1997. Accordingly, the Commission should grant the Applicant's Motion for Extension of Time, but limit the time in which to file the Experimental Retail Wheeling Pilot to July 1, 1997. Ninety (90) days is a more than adequate period in which to file an Experimental Pilot Project.

WHEREFORE, MIEC respectfully requests that the Commission enter its Order extending the time within which UE has to file the Experimental Pilot Program until no later than July 1, 1997.

Respectfully submitted,

PEPER, MARTIN, JENSEN
MAICHEL & HETLAGE

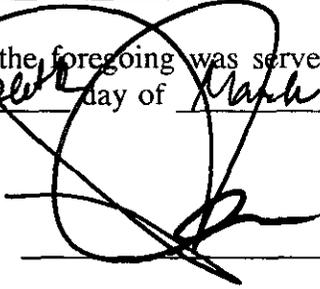


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Attorneys for Missouri Industrial
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served upon all parties of record, by U.S. mail, postage prepaid, on this 26th day of March, 1997.



A handwritten signature in black ink is written over a horizontal line. The signature is highly stylized and appears to be a cursive name, possibly starting with 'R' and ending with a flourish.