



Missouri Public Service Commission

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April 10, 2000

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FILED 2

APR 10 2000

Missouri Public Service Commission

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

RE: Case No. EM-96-149 - 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.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a STAFF AND PUBLIC COUNSEL SECOND JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE NOTICES OF AREAS OF DISAGREEMENT.

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,

Handwritten signature of Steven Dottheim

Steven Dottheim
Chief Deputy General Counsel
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Enclosure
cc: Counsel of Record

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

**FILED<sup>2</sup>**

APR 10 2000

Missouri 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**

**STAFF AND PUBLIC COUNSEL SECOND JOINT MOTION FOR EXTENSION  
OF DEADLINE TO FILE NOTICES OF AREAS OF DISAGREEMENT**

COMES NOW the Missouri Public Service Commission Staff (Staff) and the Office of the Public Counsel (Public Counsel), collectively "Joint Movants," and for their Second Joint Motion for Extension of Deadline to File Notices of Areas of Disagreement state as follows:

1. On February 17, 2000, Company filed its Final Earnings Report filing for the first sharing period of the second Experimental Alternative Regulation Plan (EARP). Pursuant to the Stipulation And Agreement approved in the above-styled case, signatories "have thirty (30) days after the final report is filed to provide notice that there may be areas of disagreement not previously brought to the attention of the Commission that need to be resolved." Stipulation And Agreement, Paragraph 7.f.x., pp. 15-16. In the past, the Joint Movants have met with Union Electric Company, d/b/a AmerenUE (Company) to discuss apparent areas of disagreement that Staff and Public Counsel have identified, before making their separate notice filings with the Commission. Such a meeting had not occurred by the approach of the March 20, 2000 date for

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the filing by the Staff and Public Counsel with the Commission of areas of disagreement respecting the first sharing period of the second EARP.

2. Thus, on March 17, 2000 the Staff and Public Counsel filed with the Commission a Joint Motion For Extension Of Deadline To File Notice Of Areas Of Disagreement, requesting until April 11, 2000 to file said notice of areas of disagreement. The Commission issued an Order Granting Extension Of Time To File Notice, permitting the Staff and Public Counsel until April 11, 2000 to file their notices of disagreement.

3. Due to matters pending in the Circuit Court Of Cole County regarding the Company's petition to review Commission Orders relating to the third sharing period of the first experimental alternative regulation plan (EARP), the Staff, Public Council and Company only just recently have been able to confer regarding matters identified by the Staff and Public Counsel in Staff and Public Council's monitoring of the first sharing period of the second EARP. Also as previously noted, the Staff is still engaged in its review of the first sharing period of the second EARP.

3. All three parties believe that further review and discussions would be beneficial. It is possible that certain areas of potential disagreement may be eliminated or narrowed and clarified based upon further discussions. The Joint Movants respectfully request that the deadline set out in Paragraph 7.f.x. of the Stipulation And Agreement in Case No. EM-96-149 be extended an additional two weeks to April 25, 2000.

4. The Staff and Public Counsel have discussed this matter with the Company and the Company has indicated that it supports the extension proposed by the Joint Movants.

5. The Joint Movants do not believe that the requested extension will unduly delay proceedings respecting the first sharing period of the second EARP.

WHEREFORE, the Joint Movants respectfully request that the Commission extend until April 25, 2000 the deadline to provide notices of areas of disagreement not previously brought to the attention of the Commission regarding the Final Earnings Report filing for the first sharing period of the second Experimental Alternative Regulation Plan.

Respectfully submitted,

**STAFF OF THE MISSOURI  
PUBLIC SERVICE COMMISSION**

DANA K. JOYCE  
General Counsel

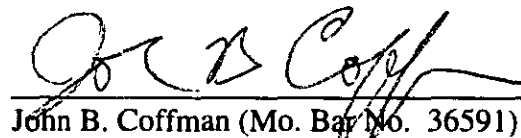
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been faxed, mailed, or hand-delivered to the following counsel for the parties of record on this 10th day of April 2000.

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