



Missouri Public Service Commission

Commissioners

KARL ZOBRIST
Chair

KENNETH McCLURE

DUNCAN E. KINCHELOE

HAROLD CRUMPTON

M. DIANNE DRAINER
Vice Chair

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
573-526-5695 (TT)
April 12, 1995

DAVID L. RAUCH
Executive Secretary

SAM GOLDAMMER
Director, Utility Operations

GORDON L. PERSINGER
Director, Policy & Planning

KENNETH J. RADEMAN
Director, Utility Services

DANIEL S. ROSS
Director, Administration

CECIL I. WRIGHT
Chief Administrative Law Judge

ROBERT J. HACK
General Counsel

Mr. David L. Rauch
Executive Secretary
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. Rauch:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF RESPONSE TO PUBLIC COUNSEL MOTION TO COMPEL**.

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

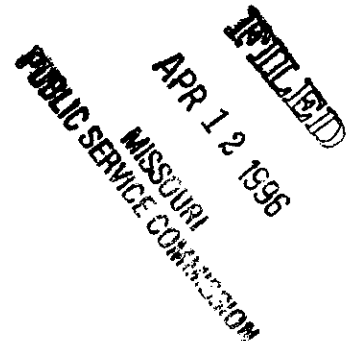
Thank you for your attention to this matter.

Very truly yours,

Steven Dottheim
Deputy General Counsel
314-751-7489

SD:ceb
Enclosure

cc: Counsel of Record



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
APR 12 1996
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,) Case No. EM-96-149
Easements and Contractual Agreements)
to Central Illinois Public Service)
Company; and (3) in connection)
therewith, certain other related)
transactions.)

STAFF RESPONSE TO PUBLIC COUNSEL MOTION TO COMPEL

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the Motion To Compel of the Office of the Public Counsel (Public Counsel) filed on April 4, 1996 and the Notice of the Missouri Public Service Commission (Commission) issued on April 5, 1996 and states as follows:

1. The Staff's data request experience with Union Electric Company (UE) is not dissimilar to that set out in the Public Counsel's Motion To Compel filed on April 4, 1996 in this docket. The Staff is engaged in an effort to resolve with UE the matter of outstanding data requests without the need for the Staff to file a Motion To Compel. Even though a successful outcome is not clear at this time, the Staff has chosen not to file presently its own Motion To Compel. As a consequence, the Staff is concerned that whatever the Commission might direct of UE, if anything, respecting the Public Counsel's Motion To Compel, that it not be to the detriment of UE's efforts to respond to the Staff's outstanding

data requests, i.e., that it not result in a lesser effort by UE in responding to the Staff's outstanding data requests.

Respectfully submitted,



Steven Dottheim
Deputy General Counsel
Missouri Bar No. 29149

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
573-751-7489
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 12th day of April, 1996.



Service list for:
Case No. EM-96-149
Updated: 12-5-95

James J. Cook
Union Electric Company
1901 Chouteau Avenue
P.O. Box 149 (M/C 1310)
St. Louis, MO 63103

Richard W. French
French & Stewart
1001 E. Cherry Street
Suite 302
Columbia, MO 65201

Michael C. Pendergast
Laclede Gas Company
720 Olive Street
Room 1530
St. Louis, MO 63101

Robert C. Johnson/Diana M. Schmidt
Peper, Martin, Jensen, Maichel and Hetlage
720 Olive Street
24th Floor
St. Louis, MO 64141-9679

Jeremiah W. Nixon/Daryl R. Hylton
Attorney General's Office
221 W. High Street
P.O. Box 899
Jefferson City, MO 65102

Susan B. Cunningham
Kansas City Power & Light Co.
1201 Walnut Street
P.O. Box 418679
Kansas City, MO 64141-9679

Lewis R. Mills, Jr.
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

James C. Swearngen
Brydon, Swearngen & England
312 E. Capitol
P.O. Box 456
Jefferson City, MO 65102

Marilyn S. Teitelbaum
Schuchat, Cook & Werner
1221 Locust Street
2nd Floor
St. Louis, MO 63103

Gary W. Duffy
Brydon, Swearngen & England
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102

Paul S. DeFord
Lathrop & Norquist, L.C.
2345 Grand Blvd.
Suite 2500
Kansas City, MO 64108

James M. Fischer
Mutual Savings Bank
1001 W. McCarty, Suite 215
Jefferson City, MO 65101