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January 3, 2001

FILED<sup>3</sup>

JAN 03 2001

Missouri Public  
Service Commission

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Public Service Commission  
Governor's Office Building  
Madison & E. Capitol  
Jefferson City, MO 65101

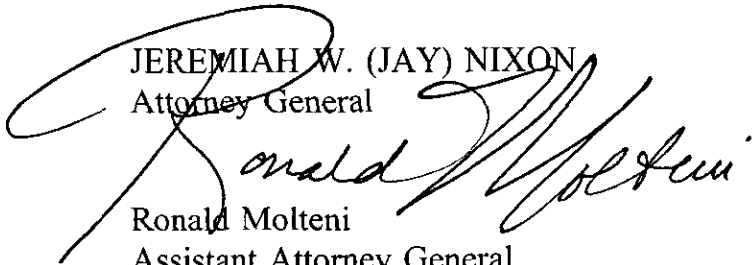
RE: *In the Matter of the Application of Union Electric Company for an Order Authorizing: (1) Certain Merger Transactions Involving Union Electric Company; (2) the Transfer of Certain Assets, Real Estate, Lease Property, Easements and Contractual Agreements to Central Illinois Public Service Company; and (3) In Connection Therewith, Certain Other Related Transactions, Case no. EM-96-149*

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are the original and 14 copies of State of Missouri's Motion for Reinstatement. Thank you for your attention to this matter.

Sincerely,

JEREMIAH W. (JAY) NIXON  
Attorney General

  
Ronald Molteni  
Assistant Attorney General

Enclosures

cc: Judge Register  
All Parties on the Service List

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
JAN 03 2001

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 ) Case No. EM-96-149  
Property, Easements and Contractual )  
Agreements to Central Illinois Public )  
Service Company; and (3) in Connection )  
Therewith, Certain Other Related )  
Transactions )

**STATE OF MISSOURI'S**  
**MOTION FOR REINSTATEMENT**

Ronald Molteni, Assistant Attorney General, appears on behalf of the State of Missouri and respectfully asks this Commission to reinstate the State of Missouri as a party to this proceeding. In support of its motion, the State asserts the following:

1. The State of Missouri received a copy of the Commission's Order Dismissing Parties issued January 2, 2001 (effective date January 12, 2001) (the "January Order"). The January Order notes that a prehearing conference was held on December 20, 2000, pursuant to a Commission order dated December 11, 2000 (the "December Order"), and that because certain parties, including the State of Missouri, did not attend that prehearing conference, they are dismissed from this case.

2. The State of Missouri's counsel apologizes to the Commission for missing the prehearing conference on December 20, 2000.

3. The State of Missouri takes very seriously the Commission's proceedings. As an example of how seriously the State of Missouri takes the Commission's proceedings, the State notes that on on November 7, 2000, its counsel telephoned a Commission ALJ from an area

hospital to inform that ALJ that the State would not be appearing at a hearing on November 8, 2000, because counsel's wife was in active labor (Case TO-99-227). On other occasions when the State's counsel has been unable to attend Commission proceedings, he has consistently informed the presiding ALJ and received permission to be excused.

4. The State's counsel has no recollection of having seen the December Order. The State has reviewed its case file and cannot locate a copy of the December Order ordering the December 20, 2000, prehearing conference.

5. Although the State's counsel regularly receives electronic communication from the Commission, some of which occasionally include Commission orders, the State's counsel has no recollection of receiving the December Order through the Internet.

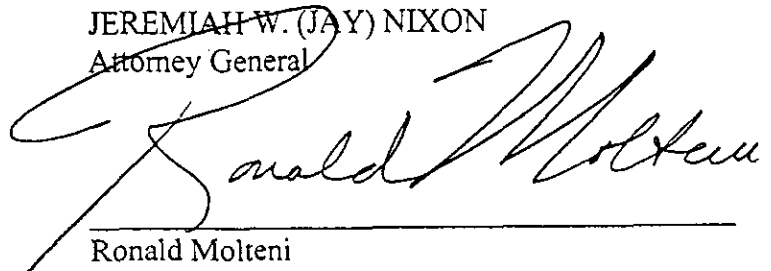
6. The State's counsel did have a conflict with the December 20, 2000, prehearing conference, and would have asked the ALJ to be excused from it because of that conflict had the State's counsel been aware of the conference.

7. Reinstating the State of Missouri as a party to this case will cause no prejudice to the other parties.

WHEREFORE, for the foregoing reasons, the State of Missouri respectfully requests that the Commission reinstate it as a party to these proceedings.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General



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Certificate of Service

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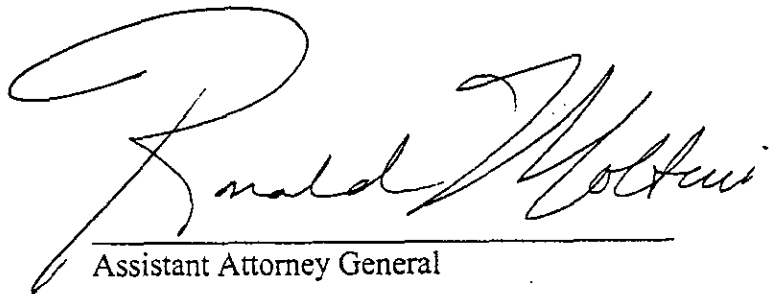
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