

Missouri Public Service Commission

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November 9, 2000

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FILED³

NOV 09 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 eight (8) conformed copies of a **JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE NOTICE 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,

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**

FILED²

NOV 09 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

**JOINT MOTION FOR EXTENSION OF DEADLINE TO
FILE NOTICE OF AREAS OF DISAGREEMENT**

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

1. On October 12, 2000, Union Electric Company, d/b/a AmerenUE (Company) filed its Final Earnings Report for the Second Sharing Period of the Second Experimental Alternative Regulation Plan (Second EARP). Pursuant to the Stipulation And Agreement approved in the above-styled case on February 21, 1997, 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." *Ibid*, Paragraph 7.f.x., pp. 15-16. Therefore, notice of such areas of disagreement would apparently be due for filing with the Commission on Monday, November 13, 2000.

2. In the past, the Joint Movants have met with the Company to discuss areas of disagreement that the Staff and Public Counsel have identified, before making their separate

filings with the Commission. The Staff and Public Counsel inquired whether the Company would be interested in such a meeting and the Company indicated that it would be interested in such a meeting. An initial meeting with the Company occurred this date respecting the Second Sharing Period of the Second EARP. The Staff and Public Counsel have advised the Company that the Staff and Public Counsel have not completed their reviews of the Second Sharing Period. Also, the Company has not had a full 20 days to respond to certain Data Requests recently submitted by the Staff and Public Counsel.

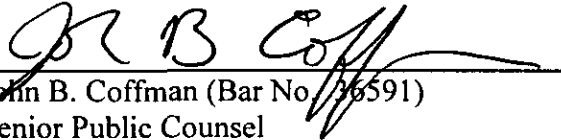
3. Thus, all areas of possible disagreement have not necessarily been identified by the Staff and Public Counsel. Also, it is possible that certain areas of disagreement may be eliminated or narrowed and clarified. As a consequence, the Joint Movants respectfully request that the deadline set in Paragraph 7.f.x. of the Stipulation And Agreement be extended until December 1, 2000.

4. The Company has indicated that it has no objection to the extension proposed by the Joint Movants.

WHEREFORE, the Joint Movants respectfully request that the Commission extend the deadline to provide notice of areas of disagreement not previously brought to the attention of the Commission regarding the Company's Final Earnings Report filing for the Second Sharing Period of the Second Experimental Alternative Regulation Plan until December 1, 2000.

Respectfully submitted,

OFFICE OF THE PUBLIC 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 parties of record on this 9th day of November, 2000.



**SERVICE LIST FOR
CASE NO. EM-96-149
Revised: November 9, 2000**

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