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Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation Into an Alternative Rate Option for Interruptible Customers of Union Electric Company d/b/a AmerenUE	))))	Case No. EO-2000-580

MOTION TO IMPLEMENT CURTAILMENT TARIFF PROPOSED BY MEG INTERRUPTIBLES ON AN INTERIM BASIS

Holnam Inc., Lone Star Industries, Inc., and River Cement Company (the "MEG Interruptibles") hereby move the Commission to implement on an interim basis a curtailment tariff incorporating the concepts recommended by Maurice Brubaker as set forth on Exhibit A to this pleading. In support of this motion the MEG Interruptibles state as follows:

1. Concurrently with the filing of this pleading, the MEG Interruptibles have filed a request with the Commission to reopen the record in this case to admit additional evidence described herein and to authorize such additional proceedings as the Commission shall deem appropriate. This Motion was prompted by recent events that occurred subsequent to the completion of the hearing in this case. These events included: (1) a statement of counsel filed with the Commission in this proceeding to the effect that Union Electric Company ("U.E.") anticipates experiencing transmission constraints in the upcoming summer period that will limit import capacity and is anticipating revising its reserved margins; (2) a statement in an article in the March 18, 2001 *St. Louis Post-Dispatch*, made in connection with an interview of Gary Rainwater, an executive of U.E. or an affiliate, to the effect that it would be necessary for U.E. to purchase approximately 450 MW of load in order to serve its Missouri customers this summer; and (3) a request filed by U.E. in Docket No. EM-2001-233 asking for Leave to Withdraw its Application for Transfer of Assets in a proceeding in which it sought to acquire approximately 500 MW of additional generating capacity to serve its Missouri jurisdictional customers.

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These events support the contentions of the MEG Interruptibles in this case and raise serious concerns about the ability of U.E. to serve its native Missouri load in the upcoming summer period. At the same time, the situation creates an opportunity for the Commission to implement a curtailment tariff incorporating the Brubaker proposals on an interim basis while this case is pending and permitting the utility at a minium to reduce its demands by 40 MW. Furthermore, additional large customers of the utility may very well be interested in availing themselves of the tariff which we propose be made available to additional primary customers which would further enhance U.E.'s ability to serve all of its customers on a reasonable economic basis.

Additionally, it appears now that the conclusion of this case may be substantially delayed because of the recent events described above. Implementation of the Brubaker Proposal in an interim tariff would protect the interests of all customers of this utility.

WHEREFORE, the MEG Interruptibles request that the Commission implement on an interim basis a curtailment tariff incorporating the concepts and proposals of witness Brubaker as set forth on Exhibit A to this pleading.

Dated at St. Louis, Missouri this 6th day of April, 2001.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing has been mailed or hand-delivered to the following on this 6th day of April 2001.

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EXHIBIT A

PROPOSED INTERRUPTIBLE RATE CONCEPTS
AmerenUE – (Missouri)

1. AmerenUE (UE) can interrupt for reliability purposes, consistent with the current tariff. UE may not interrupt simply because it anticipates the approach of a system peak.

2. The demand/energy structure of the rate, and the price relationship to the firm tariff, is maintained.

3. In addition to the reliability-based interruptions in paragraph 1, UE may, during not more than 60 hours per calendar year, declare a "high cost period." Such a period may be declared only if UE's anticipated incremental cost of generating or purchasing power exceeds $500 per megawatthour (MWh). The customer has the right to curtail or to continue to purchase power during such periods.

4. UE will provide the customer with notice of the "high cost" period by not later than 8:00 AM on the preceding day. At such time, UE will provide the customer with its good faith best estimate of the incremental cost which will form the basis for the payment or credit.

    a. The incremental cost amount quoted will be fixed, and not subject to later change.

    b. The customer will have six hours to notify UE whether it intends to curtail or continue to purchase power. If the customer elects to purchase power, it will be charged a price equal to the quoted incremental cost, plus a mark-up of 1¢ per kilowatthour (kWh), for all kWh actually taken in excess of its assurance power demand.

    c. If the customer elects to curtail, it shall advise UE of the level of demand to which it shall curtail, which may be equal to, greater than, or less than its assurance power demand level. The customer will receive a payment from UE equal to 90% of the quoted incremental cost times the number of kWh estimated to have been curtailed.

    d. If the customer makes an election to curtail, but fails to curtail to the level indicated, it shall be subject to a penalty. The penalty will equal $10 per kW times the difference between the committed curtailment and the actual average demand experienced during the curtailment period.

5. On-peak hours will be 10 AM – 8 PM, Monday through Friday.

6. Customer may change the level of its contracted Assurance Power Demand level with 90 day's notice. After a change has been made, no additional change may become effective sooner than 12 months following the date of change.

7. UE will maintain records supporting its good faith best estimate and the actual incremental cost. These records will be subject to review by the MPSC Staff and by the interruptible customers.

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