

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

314.554.2237
314.554.4014 (fax)
JJCOOK@AMEREN.COM

FILED³

MAR 20 2001

March 19, 2001

VIA FACSIMILE AND FEDERAL EXPRESS

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: MPSC Case No. EO-2000-580

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Request For Leave To File Supplemental Statement and Supplemental Statement**.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "James J. Cook", written over a horizontal line.

James J. Cook
Managing Associate General Counsel

JJC/mlh
Enclosures

cc: Mr. Lewis Mills
Hearing Examiner

Parties on Attached Service List

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
MAR 20 2001

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

Missouri Public
Service Commission

**REQUEST FOR LEAVE TO FILE
SUPPLEMENTAL STATEMENT**

COMES NOW, Union Electric Company, d/b/a AmerenUE ("the Company") and
requests leave from the Commission to file the attached Supplemental Statement.

The brief Supplemental Statement attached to this Request explains why this
request is being made at this time. The Company suggests that the acceptance of this
Statement will not harm any party; and the Company will, of course, not object to the
submission of a reply from any of the other parties to this case.

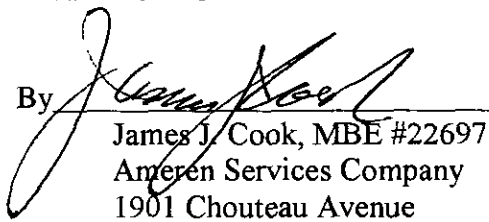
WHEREFORE, for the reasons set forth above and in the Statement itself, the
Company respectfully requests that this Supplemental Statement be accepted by the
Commission in this matter.

Date: March 19, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By


James J. Cook, MBE #22697
Ameren Services Company
1901 Chouteau Avenue
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2237
(314-554-4014 (fax)
jjcook@ameren.com

**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	)	Case No. EO-2000-580
Electric Company d/b/a AmerenUE	)	

SUPPLEMENTAL STATEMENT

COMES NOW, Union Electric Company, d/b/a AmerenUE ("the Company") and as a Supplemental Statement, states the following:

In various pleadings and testimony in this case, AmerenUE has maintained that the Company is not facing a capacity crisis. These statements have been made in response to MEG claims that the Company is facing such a crisis, and therefore the 40 MW of load which MEG wishes to place on its proposed "interruptible" rate are required to help alleviate that situation.

UE's position has been that no such crisis exists; but to the extent that the Company needs to plan for additional capacity, the MEG's proposal is not the appropriate answer.

The Company asks leave to file this Supplemental Statement because recent studies conducted by the Company have suggested that, because of constrained transmission facilities, the Company's import capacity for Summer 2001 is severely limited. This has caused the Company to re-evaluate the reserve margin it should maintain, in order to assure continued reliable service to its customers.

The recent studies and re-evaluation of the Company's capacity needs will likely result in new decisions in the near future concerning both short and long term capacity

additions. As with any portfolio of generating capacity, a diverse range of options will be considered. Economics and reliability will, of course, be important considerations as decisions are made. Included in that range of options may very well be new market-based curtailment options and enhancements of current market-based curtailment options, as well as capacity additions and purchases. Clearly, options that will not be considered, would be those, such as the Brubaker proposal, which are uneconomical and burdensome.

The Company brings this matter to the Commission's attention in order that the Commission may be fully apprised of the most recent developments in this area -- largely arising subsequent to the hearing in this case. The Company is concerned that, at the surface, the position taken in this case will appear inconsistent with actions the Company anticipates taking in the near future. This is not the case.

The Company's opposition to the Brubaker proposal is unchanged. Even in light of the Company's recent studies and anticipated need for additional capacity, the Brubaker proposal does not offer an economical or workable source of capacity. In addition, as previously developed on the record of this case, MEG's 40 MWs of interruptible load has already been more than offset by the new curtailable load available under the new Riders L and M. MEG's 40 MWs will be of no value whatsoever if that 40 MWs comes at the cost included in the Brubaker proposal.

The Company suggests that this clarification of the Company's capacity situation addresses a question that is largely irrelevant to a decision in this case. The issues listed by the Staff, and addressed by the Staff and Company in this case do not include a question of whether AmerenUE needs additional capacity. Rather the basic issue is whether the Company should be forced to acquiesce in the demands of these three

customers for an uneconomical discount, with restrictive conditions, in order to obtain the ability to interrupt 40 MWs of their load. However, though irrelevant to this case, the MEG raised the matter several times, albeit without any specific evidence to support their claims.

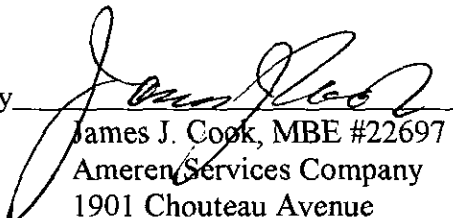
The Company believes that this clarification is needed to allow the Commission to better understand what might otherwise appear as inconsistent positions.

WHEREFORE, for the reasons stated above, AmerenUE hereby requests that this clarification of its capacity situation, as that may be relevant to a decision in this case, be brought to the attention of the Commission before a decision is reached in this case.

Date: March 19, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By 
James J. Cook, MBE #22697
Ameren Services Company
1901 Chouteau Avenue
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2237
(314-554-4014 (fax)
jjcook@ameren.com

CERTIFICATE OF SERVICE

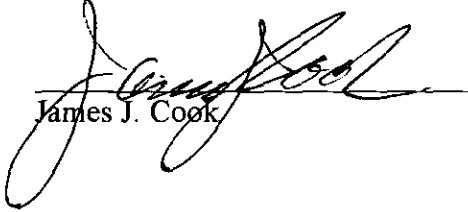
I hereby certify that a copy of the foregoing was served via U.S. first class mail on this 19th day of March, 2001, on the following parties of record:

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101

Mr. Robert C. Johnson
720 Olive Street, Ste. 2400
St. Louis, MO 63101

General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Dennis Frey
Assistant General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102


James J. Cook