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March 10, 2003

BY FEDERAL EXPRESS

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Governor Office Building St. Louis, Missouri 65101

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Missouri Public Service Commission

Re:

Case No. EO-2003-0271

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copies of the Missouri Industrial Energy Consumers' Statement of Opposition to the Procedural Schedule Proposed by Union Electric Company.

Please "file-stamp" the additional copies.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Diana M. Vuylteke Diana M. Vuylsteke

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri Public Service Commission

In re: Application of Union Electric)	OSI VICE Commission
Company For Authority to Participate)	Case No. EO-2003-0271
in the Midwest ISO through a Contractual)	
Relationship with Grid America)	

MISSOURI INDUSTRIAL ENERGY CONSUMERS' STATEMENT OF OPPOSITION TO THE PROCEDURAL SCHEDULE PROPOSED BY UNION ELECTRIC COMPANY

Comes now Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, DaimlerChrysler, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, Monsanto Company, Pharmacia, Recoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and files its statement in opposition to the alternative procedural schedule proposed by Union Electric Company ("UE") on March 7, 2003. For its response, the MIEC states as follows:

- 1. UE filed its Motion for Adoption of Expedited Procedural Schedule on February 13. Staff filed an alternative proposed schedule on February 24. The MIEC filed its response on February 24. The MIEC's response supported the Staff's alternative proposed schedule and opposed UE's proposed procedural schedule. UE filed its alternative procedural schedule on March 7.
- 2. The MIEC opposes the March 7 alternative schedule proposed by UE. The MIEC's witness Jim Dauphinais is unavailable on the hearing dates of June 26 and 27 proposed in that schedule. Mr. Dauphinais would be available during the prior week or the following week.
- 3. Counsel for the Commission Staff has informed the MIEC that the Staff supports the need for a procedural schedule which would accommodate Mr. Dauphinais.

4. The MIEC continues to support the alternative procedural schedule supported by the Commission Staff.

WHEREFORE, the MIEC requests that the Commission reject the alternative procedural schedule proposed by UE and adopt the alternative schedule proposed by the Commission Staff.. If the Commission nevertheless adopts the alternative procedural schedule proposed by UE, the MIEC requests that the Commission adjust the hearing dates to permit Mr. Dauphinais' appearance at the hearing.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all parties on the Commission's service list by first class United States Mail this 10th day of March, 2003.