Ameren Services

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March 1, 2001

FILED

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Missouri Public
Service Commission

VIA FEDERAL EXPRESS

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 **Response to MEG Motion for Oral Argument**.

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,

James J. Cook
Managing Associate General Counsel

JJC/mlh
Enclosure

cc: Parties on Attached Service List

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

RESPONSE OF UNION ELECTRIC COMPANY
TO
MEG MOTION FOR ORAL ARGUMENT

Union Electric Company states the following in response to the Motion of MEG Interruptibles for Oral Argument:

1. The legal and factual issues in this matter are no more complex, and in fact, are much less complex, than most cases that come before this Commission.
2. The Company continues to strongly object to the mischaracterization of the Company's capacity, and the scare tactics that MEG continues to pursue. There is no "power shortage" and there is no "lack of system reliability."
3. There is no confusion in regard to the Brubaker tariff.
4. The Company suggests that although the granting of the Motion will not adversely impact any party, it sees little that will be gained by granting the Motion. The Commission well knows MEG's position. Hearing it personally, again, will do little to help the Commission reach a decision.

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Although Union Electric does not oppose the request for oral argument, it sees no reason to grant the request.

Date: March 1, 2001

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By _____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U.S. first class mail on this 1st day of March, 2001, on the following parties of record:

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