

Diana M. Vuylsteke Voice: 259-2543 dmvuylsteke@bryancave.com

February 18, 2005

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, Missouri 65101

FILED<sup>2</sup>
FEB 1 8 2005

Missouri Public Service Commission

Re:

Case No. F.A-2005-0180

Dear Mr. Roberts:

Attached for filing in the above-referenced case are an original and eight (8) copies of the Prehearing Brief of the Missouri Industrial Energy Consumers.

Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

Diana M. Vuylsteke

Diana Vingleteke

DMV:rms

Enclosures (9)

cc: All Parties

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Washington, DC

And Bryan Cave, A Multinational Partnership,

London

FILED<sup>2</sup>

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FEB 1 8 2005

In the Matter of the Application of Union Electric	)	Gervice Commission
Company for a Certificate of Public Convenience	)	
and Necessity Authorizing it to Construct, Install,	)	
Own, Operate, Control, Manage and Maintain	)	Case No. EA-2005-0180
Electric Plant, as Defined in Section 386.020(14),	)	
RSMo, to Provide Electric Service in a Portion of	)	
New Madrid County, Missouri, as an Extension	)	
of its Existing Certificated Area.	)	

## PREHEARING BRIEF OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch, The Boeing Company, DaimlerChrysler, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, J.W. Aluminum, Monsanto Company, Pfizer, Precoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and files its Prehearing Brief.

A the hearing in this case, the MIEC will submit the testimony of Michael Gorman. This testimony demonstrates that AmerenUE's economic projections, adjusted to reflect the impact on AmerenUE's existing native load customers, indicate that existing Missouri retail electric customers will neither benefit nor be harmed by granting AmerenUE's request to expand its service area and serve Noranda under the proposed LTS rate.

Respectfully submitted,

BRYAN CAVE, LLP

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ATTORNEY FOR THE MIEC

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have served on all parties by electronic service this 18<sup>th</sup> day of February, 2005.

Diana M. Vuylsteke

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