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May 2, 2001

FILED³
MAY 03 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65102

Missouri Public
Service Commission

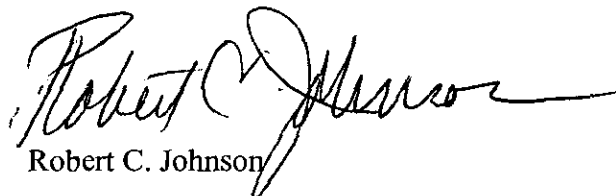
Re: MoPSC Case No.: EO-2000-580

Dear Mr. Roberts:

Enclosed for filing on behalf of the MEG Interruptibles, River Cement Company, et al, are an original and eight (8) copies of their Reply to the Response of Union Electric Company to the MEG Interruptibles Motion to Reopen the Record and Motion to Implement Curtailment Tariff on an Interim Basis.

I will appreciate your acknowledging receipt of this enclosure by file-stamping a copy of the enclosed letter and returning same to me in the enclosed stamped, self-addressed envelope.

Yours very truly,



Robert C. Johnson

RCJ/gmw
Enclosures
cc: All parties of record
Maurice Brubaker

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MAY 03 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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)

**REPLY OF THE MEG INTERRUPTIBLES
TO RESPONSE OF UNION ELECTRIC COMPANY TO THEIR
MOTION TO REOPEN THE RECORD AND MOTION TO IMPLEMENT
CURTAILMENT TARIFF ON AN INTERIM BASIS**

COME NOW, Holnam Inc., Lone Star Industries, Inc., and River Cement Company (the "MEG Interruptibles") and in reply to the late filed Response of Union Electric Company ("U.E.") to the MEG Interruptibles' Motion to Reopen the Record and Motion to Implement Curtailment Tariff on an Interim Basis in the above-styled case, state as follows:

1. U.E. has not expressed opposition to inclusion in the record in this case the Supplemental Statement of its counsel previously filed herein. Accordingly, since no party has expressed any opposition to inclusion of the Supplemental Statement in the record, we ask that the Commission accept it as part of their record in this proceeding. The newspaper article referred to by the counsel for U.E. clearly contains relevant information in that the statement of Mr. Gary Rainwater, an officer of Ameren Corporation, confirms the necessity for a significant purchase of power on the open market for the purpose of meeting the U.E. summer load. U.E. does not deny this fact and stated "This is not news to the Commission." Accordingly, this article also should be accepted as part of the record in this case and considered by the Commission in making its decision.

2. The third item requested to be included as part of this record is a copy of U.E.'s pleading requesting dismissal of Case No. EM-2001-233, in which U.E. had requested the transfer of approximately 500 megawatts of generation to the Missouri jurisdiction. Clearly, this is

extremely relevant information and should be included in the record. The Commission has all necessary authority to take administrative notice of this filing.

3. The matters to be included in the record as proposed by the MEG Interruptibles all further confirm and support the testimony of Maurice Brubaker in this case and the position of the MEG Interruptibles throughout this proceeding. There is absolutely no question that U.E., out of necessity, is required to purchase significant amounts of power in order to meet its summer load; that it has experienced transmission constraints that require an increase in its margin requirements and that the cost of implementing the tariff proposed by witness Brubaker is no higher than and probably less than the cost of U.E.'s natural-gas-fired capacity. (TR pp 10-11) We urge the Commission to accept and include in the record in this case all the materials identified in the MEG Interruptibles motion.

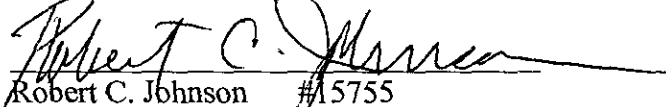
4. U.E. opposes the proposal to implement on an interim basis the Interruptible Tariff proposed by witness Brubaker, U.E.'s arguments attempt to obfuscate the real underlying issues in this proceeding. The facts are that U.E. has a capacity shortage; that U.E. is experiencing transmission constraints that adversely affect its ability to import power this summer. Clearly, implementation of the Brubaker Tariff accrues U.E. of 40 megawatts of curtailable power and therefore is beneficial for all customers. Furthermore, immediate implementation will give the Commission the opportunity to determine the effectiveness and benefits of the Tariff. There is no downside risk.

5. While the tariff proposed by witness Brubaker is substantially different than the traditional interruptible tariff in effect previously on the U.E. system, the discount provided in the case of the mandatory curtailment provisions, is the same discount that was provided in Rate 10M, the traditional Interruptible Tariff, which was in effect for more than twenty-five years. It is

interesting that U.E. suddenly and vigorously opposes the concepts of mandatory curtailment that served it and its retail customers so well for so many years.

WHEREFORE, we urge the Commission to grant the Motions of the MEG Interruptibles.

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 2nd day of May 2001.

A handwritten signature in cursive script, appearing to read "Robert C. Johnson", written over a horizontal line.

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