



## Missouri Public Service Commission

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December 8, 2000

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DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
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Jefferson City, MO 65102

**FILED<sup>2</sup>**  
DEC 8 2000  
Missouri Public  
Service Commission  
ES-2001-359

**RE: Case No. ES-2001-359 - In the Matter of Union Electric Company d/b/a/ AmerenUE regarding an incident at the Venice Power Plant in Venice, Illinois on August 10, 2000.**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO OPEN CASE**.

This filing has been mailed via U. S. Certified Mail or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Eric William Anderson  
Assistant General Counsel  
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Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
DEC 8 2000

Missouri Public  
Service Commission

In the Matter of Union Electric Company )  
d/b/a AmerenUE regarding an incident at )  
the Venice Power Plant in Venice, Illinois )  
on August 10, 2000.

Case No. ES-2001-359

MOTION TO OPEN CASE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion to Open Case states:

1. The Missouri Public Service Commission ("Commission") has the authority to establish a case for the purpose of receiving information from the public utilities under its jurisdiction pursuant to the provisions of Section 393.140 RSMo 1994, among other statutes. Union Electric Company, doing business as AmerenUE ("AmerenUE"), is an electrical corporation as defined in Section 386.020(15) RSMo (Supp. 1999) and, as such, is a public utility subject to the Commission's jurisdiction pursuant to Section 386.020(42) RSMo (Supp. 1999). By rule, the Commission requires certain information on forced outages to be provided to the Manager of the Energy Department of the Commission. 4 CSR 240-20.080.

2. AmerenUE provides electrical power to areas in Missouri.

3. On Tuesday, August 10, 2000, at approximately 5:55 p.m., fire and electrical faults occurred at AmerenUE's Venice Power Plant in Venice, Illinois.

4. As a result of the fire and electrical faults, extensive damage to the Unit # 1, a 40 MW gas or oil fired unit, was sustained. Additional damage to station transformers, other facilities in the plant, and transformers in the adjoining substation resulted in losses in equipment

of approximately \$25 million. There were no fatalities or major injuries reported as a result of this incident.

5. Staff has initiated a formal investigation into the incident.

**WHEREFORE**, the Staff respectfully requests that the Commission open a case for the purpose of receiving information, including a Staff Electrical Incident Report, concerning the incident at the Venice Power Plant in Venice, Illinois.

Respectfully submitted,

DANA K. JOYCE  
General Counsel



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Assistant General Counsel  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 8<sup>th</sup> day of December 2000.



**Service List for**

Case No. ES-2001-\_\_

Revised: December 8, 2000 (RR)

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