

September 21, 1999

**VIA FEDERAL EXPRESS**

**FILED<sup>2</sup>**

SEP 22 1999

Missouri Public  
Service Commission



Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
P.O. Box 360  
Jefferson City, MO 65102

Re: MPSC Case No. EC-2000-151

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 fourteen (14) copies of the following:

1. Answer of Respondent
2. Motion to Consolidate Complaint Cases

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,

A handwritten signature in black ink, appearing to read "J. Cook", is written over the typed name.

James J. Cook  
Managing Associate General Counsel

JJC/pg  
Enclosures

cc: Office of Public Counsel

Buster McGowin  
#47 Highway JJ  
Ulman, MO 65083

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>  
SEP 22 1999  
Missouri Public  
Service Commission

Buster McGowin	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-151
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

**MOTION TO CONSOLIDATE COMPLAINT CASES**

Comes now Union Electric Company, doing business as AmerenUE and respectfully requests that the Missouri Public Service Commission consolidate this complaint case with the other cases listed on Attachment 1 attached hereto. In support of this request, AmerenUE states the following:

1. On August 23, 26, 30, and September 2, the Commission issued 43 Notices of Complaint against Union Electric Company.
2. All of the complaint cases have the same factual situations underlying them-- that is a series of power outages in one area of AmerenUE's electric service territory. Almost all of the complaints contain the same typed words setting out the complaint, with only the name of the complainant handwritten at the top of the pleading. As such, it is obvious that each complaint case involves the same concerns about AmerenUE's actions.
3. AmerenUE submits that its answer to the complaints, and its defense to each of them, should hearings be required will be the same in every case.
4. Some Complainants have set out specific concerns about the effects of the outages. These additional claims do not significantly change the basic claims of the complaints, nor the defense that the Company would make if the cases go to hearing.

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5. The Staff of the Missouri Public Service Commission has indicated to the undersigned attorney for AmerenUE that the Staff does not object to the consolidation of this case.

WHEREFORE, for the reasons stated above, AmerenUE asks that the Commission order that this case be consolidated for all purposes, with the other similar cases set out on Attachment 1, as appropriate under the Commission's rules.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By

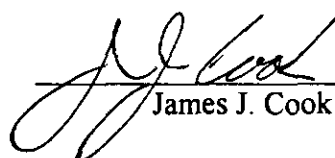
  
James J. Cook, MBE 22697  
Managing Associate General Counsel

Ameren Services Company  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-2237  
(314) 554-4014 (fax)

DATED: September 21, 1999

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via first-class U.S. mail, postage prepaid, on this 21<sup>st</sup> day of September, 1999, to the Office of Public Counsel and Complainant.

  
James J. Cook

ATTACHMENT 1

Frank E. Dilley	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-63
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Marshall E. Humphreys, III	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-64
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Donald L. Hibler	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-70
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Quentin Lupardus	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-71
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

John J. Williams, II  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-72

Georgette A. Patterson  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-73

Donald D. Patterson  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-74

William W. Patterson  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-75

Joseph P. Aliksaites  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-76

Mildred Aliksaites  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-77

Herbert Nixdorf  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-78

Linda Sue Nixdorf  
Complainant

v.

Union Electric Company  
d/b/a AmerenUE  
Respondent

Case No. EC-2000-79

Jo Ann Jeffries	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-80
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
James Aliksaites	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-81
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Betty J. Drace	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-82
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
James M. Myers	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-83
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Lucretia Drace	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-84
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
David and Brenda Haley	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-86
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Paul and Rebecca Young	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-87
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Sharon K. Abbott	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-88
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	



Gene S. Bax	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-89
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Robert J. Sparrow	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-90
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Pauline Hensley	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-93
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
	)	
Douglas Zeigenbein	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-96
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Paul R. Patterson	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-97
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Jimmy J. Myers	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-99
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Dustin J. Myers	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-100
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Stephanie S. Myers	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-101
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

James A. Pankey	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-104
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Deitra Brouk	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-132
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Kenneth and Marilyn Carico	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-136
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Lloyd E. Reed	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-137
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Randolph E. Shipp	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-138
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Eddie Reed	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-139
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
James and Melissa Carico	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-147
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Tammy Byrd	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-149
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Steve Byrd	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-150
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Buster McGowin	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-151
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Myna McGowin	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-152
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Steven D. Patterson	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-174
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	

Ruby Otto	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-183
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
Lonnie Jeffries	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-184
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	
James and Rita Jeffries	)	
Complainant	)	
	)	
v.	)	Case No. EC-2000-201
	)	
Union Electric Company	)	
d/b/a AmerenUE	)	
Respondent	)	