

September 21, 1999

VIA FEDERAL EXPRESS

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

FILED²

SEP 22 1999

Missouri Public
Service Commission



Re: MPSC Case No. EC-2000-78

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 dark 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

Herbert Nixdorf
332 Highway C
Ulman, MO 65083

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

SEP 22 1999

Missouri Public
Service Commission

Herbert Nixdorf
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-78

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:

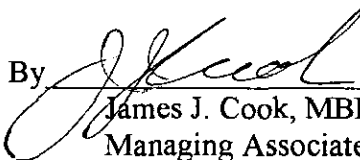
1. On August 23, 26, 30, and September 2, the Commission issued 43 Notices of Complaint against Union Electric Company.
2. All of the complaint cases have the same factual situations underlying them-- that is a series of power outages in one area of AmerenUE's electric service territory. Almost all of 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.

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 21st 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. |) | Case No. EC-2000-76 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

| | | |
|------------------------|---|---------------------|
| Mildred Aliksaites |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-77 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

| | | |
|------------------------|---|---------------------|
| Herbert Nixdorf |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-78 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

| | | |
|------------------------|---|---------------------|
| Linda Sue Nixdorf |) | |
| Complainant |) | |
| |) | |
| v. |) | Case No. EC-2000-79 |
| |) | |
| Union Electric Company |) | |
| d/b/a AmerenUE |) | |
| Respondent |) | |

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.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-84

David and Brenda Haley
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-86

Paul and Rebecca Young
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-87

Sharon K. Abbott
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-88

| | | |
|------------------------|---|---------------------|
| 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.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-97

Jimmy J. Myers
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-99

Dustin J. Myers
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-100

Stephanie S. Myers
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-101

James A. Pankey
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-104

Deitra Brouk
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-132

Kenneth and Marilyn Carico
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-136

Lloyd E. Reed
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-137

Randolph E. Shipp
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-138

Eddie Reed
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-139

James and Melissa Carico
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-147

Tammy Byrd
Complainant

v.

Union Electric Company
d/b/a AmerenUE
Respondent

Case No. EC-2000-149

| | | |
|------------------------|---|----------------------|
| 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 |) | |