

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
SEP 22 1999

Missouri Public
Service Commission

Donald L. Hibler)
Complainant)
)
v.)
)
Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-70

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.

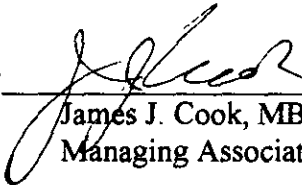
5. The Staff of the Missouri Public Service Commission has indicated to the undersigned attorney for AmerenUE that the Staff does not object to the consolidation of this case.

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


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(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.)

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.)

Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-80

James Aliksaites)
Complainant)

v.)

Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-81

Betty J. Drace)
Complainant)

v.)

Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-82

James M. Myers)
Complainant)

v.)

Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-83

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.)
Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-89

Robert J. Sparrow)
Complainant)
v.)
Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-90

Pauline Hensley)
Complainant)
v.)
Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-93

Douglas Zeigenbein)
Complainant)
v.)
Union Electric Company)
d/b/a AmerenUE)
Respondent)

Case No. EC-2000-96

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)