BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric)	
Company d/b/a AmerenUE's Purchased)	
Gas Adjustment Factors to be Audited)	Case No. GR-2009-0337
in its 2008-2009 Actual Cost)	
Adjustment.		

STAFF RECOMMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the above-captioned matter and for its recommendation states as follows:

- 1. On October 16, 2009, Union Electric Company d/b/a Ameren UE (AmerenUE or Company), of St. Louis, Missouri, filed four (4) tariff sheets requesting an effective date of November 1, 2009. On October 20, 2009, AmerenUE filed substitute tariff sheets to correct a formatting issue with the tariff sheets.
- 2. These tariff sheets were filed to reflect changes in AmerenUE's PGA factors as a result of estimated changes in the cost of natural gas and changes in the ACA component.
 - 3. UE requests that the tariff sheets go into effect on November 1, 2009.
- 4. Generally the PGA rates remain the same as current rates, with the exception of the Rolla area which receives natural gas through MoGas Pipeline, which has filed a rate case at the Federal Energy Regulatory Commission.
- 5. Case No. GR-2009-0337, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2008-2009 ACA filing.

6. This rate change should be on an interim, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2009-0337, GR-2008-0366, and GR-2008-0107.

7. Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 31,

2010.

8. Staff has reviewed this filing and has determined that it was calculated in conformance with AmerenUE's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets and of the waiver request on less than thirty (30) days notice is demonstrated by AmerenUE's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings.

WHEREFORE, Staff recommends AmerenUE's PGA tariff sheets as filed on October 16, 2009 and as substituted on October 20, 2009 be approved, interim subject to refund with an effective date of November 1.

Respectfully submitted,

/s/ Lera L. Shemwell

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October 2009.											-	

/s/ Lera L. Shemwell	/s/	Lera L.	Shemwell		
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