BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File)	
Tariffs Increasing Rates for Natural Gas)	Case No. GR-2007-0003
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

AMERENUE'S GROUNDS FOR CLAIMING INFORMATION IS HIGHLY CONFIDENTIAL

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or "Company"), and pursuant to paragraph K of the Protective Order issued by the Missouri Public Service Commission in this proceeding, hereby provides its grounds for claiming certain information contained in its direct testimony is appropriately designated as "Highly Confidential." In support hereof, AmerenUE states as follows:

- 1. On July 7, 2006, AmerenUE filed in this proceeding a request for a general rate increase for natural gas service provided in its Missouri service area. In accordance with the Commission's regulations, as part of that filing AmerenUE included its direct testimony.
- 2. One of the AmerenUE witnesses filing direct testimony, Scott A. Glaeser, provided testimony addressing the Company's proposal to combine its four separate purchased gas adjustment areas. In addressing that topic, on page 8 of his direct testimony Mr. Glaeser cited specific discounted firm transportation rates AmerenUE has negotiated with certain interstate pipeline companies it uses to transport natural gas--Panhandle Eastern Pipe Line Company and Natural Gas Pipeline Company of America. The testimony also provides a rate differential calculation based on those negotiated discount rates.
- 3. AmerenUE has designated both discounted rates and the differential as "Highly Confidential." This designation is appropriate because discounted transportation rates with interstate pipelines constitute "market-specific information" related to AmerenUE's acquisition

of gas for its customers. This information is related to "services offered in competition with others" because AmerenUE's sales service is offered to industrial customers in competition with gas available from unregulated producers and marketers. The discounted rates also provide critical information about "strategies employed...in contract negotiations." *See* Order Granting Motion for Protective Order, Attachment A, p. 1.

4. Disclosure of the information AmerenUE has designated as Highly Confidential would harm both the Company and its customers. It would adversely affect AmerenUE's relationships with the pipelines whose confidential discounted rates would be disclosed. More importantly, it would create an impediment for AmerenUE to obtain discounts in the future from these pipelines and any other pipelines that do not want confidential discounts they are offering to AmerenUE to be disclosed to the public. Finally, disclosure of the existing discounts would compromise AmerenUE's ability to negotiate better discounts in the future, all to the detriment of AmerenUE's customers.

Dated: July 12, 2006

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a AmerenUE

Bv:

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July 12, 2006

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 12th day of July, 2006.

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