BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Natural Gas Service Provided to Customers in the Company's Missouri Service Area.

<u>Case No. GR-2007-0003</u> Tariff No. YG-2007-0008

PUBLIC COUNSEL'S RECOMMENDATIONS REGARDING TEST YEAR AND TRUE-UP

COMES NOW the Office of the Public Counsel ("Public Counsel") and for its Recommendations Regarding Test Year and True-up states as follows:

1. On July 11, 2006, the Commission issued an order directing Public Counsel and other parties to respond to AmerenUE's test year proposal and to offer a recommendation concerning a true-up.

2. Using the same test year for the electric and gas rate cases will allow them to be processed efficiently whether or not they are consolidated. AmerenUE proposed a test year in the gas rate case that allows sufficient time for AmerenUE to close its books and parties to analyze the data before the evidentiary hearings next March. The test year it proposed in the electric case does not. Public Counsel recommends that the Commission adopt a test year ended June 30, 2006, updated through September 30, 2006.

3. On August 2, 2006, in Case No. ER-2007-0004, the Commission issued an order deferring a decision on a true-up until after the parties have had the opportunity to discuss the need for a true-up. Public Counsel recommends that the Commission follow the same procedure in this case.

WHEREFORE, Public Counsel respectfully offers these recommendations regarding test

year and true-up.

Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ Lewis R. Mills, Jr.

By:_____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 7th day of August 2006:

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