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 in its)	Case No. GR-2006-0333
2005-2006 Actual Cost Adjustment.)	

AMENDED STAFF RECOMMENDATION PLEADING

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the above-captioned matter and for its Amended Pleading states that the table in the September 21 Staff Recommendation pleading was incorrect, although the correct table appeared in the staff Recommendation, the table in the cover pleading was incorrect. The pleading below contains the correct table.

- 1. On October 17, 2006, Union Electric Company d/b/a AmerenUE (Ameren), filed four (4) tariff sheets to reflect changes in Ameren's Purchased Gas Adjustment (PGA) factors as a result of estimated changes in the cost of natural gas for the 2005-2006 winter season, as well as changes in the Actual Cost Adjustment (ACA) factor.
- 2. Ameren has service territories with different suppliers, so it has separate PGA's for each area. Staff's memorandum details its analysis of Ameren's gas purchasing practices.
- 3. As a result of Staff's analysis, Staff recommends the Commission issue an order requiring Ameren to:
 - A. Establish the following account balances in its next ACA filing to reflect the (over)/under recovery of the ACA balances to be (refunded)/collected from the ratepayers as of August 31, 2006:

	Balance per	Staff	Ending
	AmerenUE Filing	Adjustments	Balances
Natural Gas Pipeline Co. of America:			
Firm Sales ACA	\$ 36,773	\$4,736	\$ 41,509
Interruptible Sales	0	0	0
Panhandle Eastern Pipe Line Co:			
Firm Sales ACA	\$ (3,928,900)	\$ (26,707)	\$ (3,955,607)
Interruptible Sales ACA	\$ 188,749	\$ (225)	\$ 188,524
Former Aquila Eastern System Incremental:			
Firm Sales	\$ 11,116	0	\$ 11,116
Texas Eastern Transmission Corp:			
Firm Sales	\$ (1,495,196)	0	\$ (1,495,196)
Interruptible Sales	\$ (279,044)	\$ (3,576)	\$ (282,620)

- B. Correct the line-loss error for its transportation customers in its 2006/2007 ACA filing so that the error has no impact on the firm sales customers ACA balance.
- C. Continue to assess and document the effectiveness of its hedges for the 2005/2006 period and beyond.
- D. Respond to Staff's concerns in the Reliability Analysis and Gas Supply and Planning section related to: (1) updated demand studies, (2) analysis of capacity requirements by pipeline, (3) analysis and support for growth for peak day capacity estimates, (4) reserve margin and capacity planning, and (5) storage monitoring and plan review for Marble Hill service area.
- E. Respond to the recommendations herein within 30 days.

WHEREFORE, the Staff recommends that the Commission order Ameren to comply with Staff's recommendations noted above.

Respectfully submitted,

/s/ Lera L. Shemwell

Lera L. Shemwell Deputy General Counsel Missouri Bar No. 43792

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-7431 (Telephone) (573) 751-9285 (Fax)

Email: lera.shemwell@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 5th day of October 2007.

/s/ Lera L. Shemwell