

ATTORNEY GENERAL OF MISSOURI

JEREMIAH W. (JAY) NIXON
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August 8, 2000

FILED²

AUG 08 2000

Missouri Public
Service CommissionPublic Service Commission
Truman State Office Building
Jefferson City, MO 65102

RE: *In the Matter of Union Electric Company d/b/a Ameren UE for
Authority to file Tariffs Increasing Rates for Gas Service Provided
to Customers in the Company's Missouri Service Area
Case No. GR-2000-512*

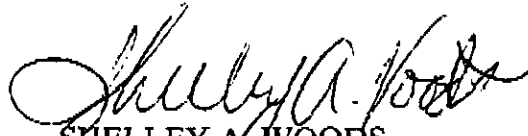
Dear Sir/Madam:

Enclosed for filing please find an original and 9 copies of the following:

1. Application To Intervene;
2. Motion To File Application To Intervene Late; and
3. Direct Testimony of Anita C. Randolph

Please stamp "filed" on the extra copies for my files. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General
SHELLEY A. WOODS
Assistant Attorney GeneralSAW:pah
Enclosures
c: Counsel of Record*to: Jan
from: Pat*

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

FILED²

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**Missouri Public
Service Commission**

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File)	
Tariffs Increasing Rates for Gas Service)	Case No. GR-2000-512
Provided to Customers in the Company's)	Tariff No. 200000747
Missouri Service Area)	

APPLICATION TO INTERVENE

COME NOW Missouri Department of Natural Resources (MDNR) pursuant to 4 CSR 240-2.075 and respectfully moves this Commission to allow it to intervene in the above-styled matter.

This application is made for the following reasons:

1. On February 18, 2000, Union Electric Company d/b/a AmerenUE (the Company) submitted to the Missouri Public Service Commission (PSC) tariffs reflecting increased rates for natural gas service provided to customers in the Missouri service area of the Company.

2. The Energy Center, formerly the Division of Energy, MDNR, is a division of a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

3. The Energy Center, MDNR, has both an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center, MDNR, will be looking at the proposed tariffs from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center, MDNR, will look at the proposed tariffs to assess the commitment by the Company to provide low or no cost weatherization to low income families. The Energy Center, MDNR review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes

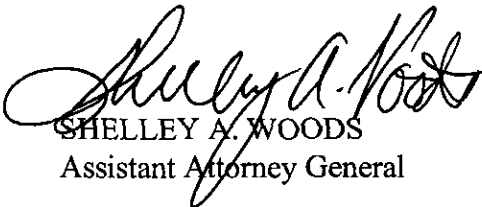
planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. The Energy Center has not come to any conclusion as to whether it supports or opposes the proposed tariffs at this time, nor has it come to any conclusion whether it supports the Company's true up recommendation, or will be suggesting an alternative.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON


SHELLEY A. WOODS
Assistant Attorney General

MBE #33525
P. O. Box 899
Jefferson City, MO 65102
Telephone (573) 751-8795
TELEFAX No. (573) 751-8464

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, by United States mail, this 8TH day of August, 2000, to:

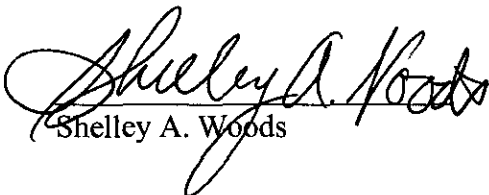
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St. Louis, Missouri 63166-6149

Thomas M. Byrne
Laclede Gas Company
720 Olive Street
St. Louis, Missouri 63101


Shelley A. Woods

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In the Matter of Union Electric Company)	
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Tariffs Increasing Rates for Gas Service)	Case No. GR-2000-512
Provided to Customers in the Company's)	Tariff No. 200000747
Missouri Service Area)	

MOTION TO FILE APPLICATION TO
INTERVENE LATE

COME NOW Missouri Department of Natural Resources (MDNR) pursuant to 4 CSR 240-2.075 and respectfully moves this Commission to allow it to intervene after the date set by this Commission in the above-styled matter. This motion is made for the following reasons:

1. On February 18, 2000, Union Electric Company d/b/a AmerenUE (the Company) submitted to the Missouri Public Service Commission (PSC) tariffs reflecting increased rates for natural gas service provided to customers in the Missouri service area of the Company.
2. On March 13, 2000, this Commission set the deadline of March 23, 2000, to file applications to intervene.
3. The Energy Center, MDNR, has both an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center, MDNR, will be looking at the proposed tariffs from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center, MDNR, will look at the proposed tariffs to assess the commitment by the Company to provide low or no cost weatherization to low income families. The Energy Center, MDNR review also will be in relation

to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. Additionally, the United States Congress recently amended the statute governing the Department of Energy's (DOE) Weatherization Assistance Program by requiring that, beginning in fiscal year 2001 and thereafter, sums appropriated for weatherization assistance grants be contingent on a cost share of 25 percent by each participating state. Without these cost share funds, Missouri will lose its current annual federal allocation of approximately \$3.5 million.

5. The MDNR hopes to use a state appropriation for weatherization in each of the past two state budget periods (FY 1999 and 2000) from the Utilicare Fund administered by the Department of Social Services as a portion of this match. However these funds alone would not be sufficient to provide the full 25 percent cost-share. There is also no guarantee that state funds will continue to be appropriated for weatherization purposes beyond fiscal year 2001, as these funds must be approved by the General Assembly through the annual budget appropriation process and approved by the Governor for each fiscal year. Further, these funds are also in competition with the demand for fuel payment assistance that fluctuates depending on whether the winter is mild or cold.

6. The 25 percent cost share may also be with non-federal leveraged resources from energy suppliers or other sources through negotiation, regulation or voluntary contributions. Funds from energy providers for weatherization services in Missouri, such as the AmerenUE Experimental

Weatherization Program, would contribute not only to meeting the new cost share requirement, but also the need for these services in Missouri.

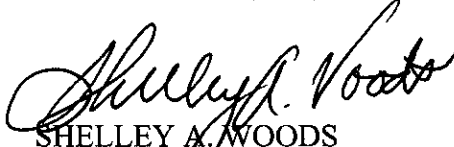
7. The Energy Center staff member who has responsibility for tracking matters before this Commission in which the Energy Center may have an interest and may choose to intervene had a stroke in early July 2000, and was consequently unable to learn of the above-styled rate case. Furthermore, due to a lack of certainty concerning the staff member's condition and time of return to work, the Energy Center has not sought to replace the staff member.

8. The MDNR is also filing its Direct Testimony on this date, which is the date set by the Commission for interveners to file Direct Testimony. The MDNR will, in all other respects, comply with the Suspension Order and Notice entered by this Commission March 13, 2000, in the above-styled case

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON


SHELLEY A. WOODS
Assistant Attorney General

MBE #33525
P. O. Box 899
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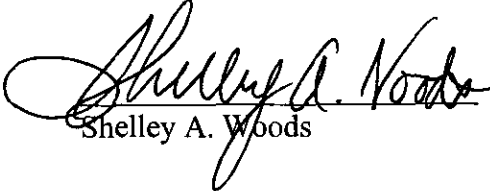
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AFFIDAVIT OF ANITA C. RANDOLPH

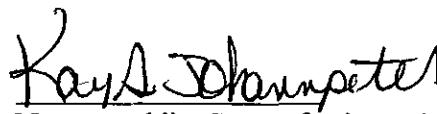
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Anita C. Randolph, being duly sworn on her oath, hereby states that she has participated in the preparation of the foregoing Direct Testimony in question and answer form; that the answers in the foregoing Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters were true and correct to the best of her knowledge, information and belief.


Anita C. Randolph

Subscribed and sworn to before me this 8th day of August, 2000.

KAY A. JOHANNPETER
NOTARY PUBLIC, STATE OF MISSOURI
MONITEAU COUNTY
My Commission Expires 8-4-2003


Notary Public, State of Missouri
County of Moniteau

