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PROFESSIONAL CORPORATION

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Robert W. Hedrick
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November 5, 2004

FILED

NOV 05 2004

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

Missouri Public
Service Commission

Re: In the Matter of the Application to Intervene in Union Electric Company d/b/a AmerenUE
Proposed Tariff Filed under Tariff No. JG-2005-0145
Case No. GT-2005-0069
Tariff File No. JG-2005-0145

Dear Mr. Roberts:

Enclosed for filing please find an original and nine copies of the APPLICATION FOR REHEARING in the above referenced case. Please stamp these copies and return one to me for my file. Thank you for your assistance.

Sincerely,


Pamela Q. Henrickson

PQH:jkb
Enclosure(s)

FILED

NOV 05 2004

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application to Intervene)	
in Union Electric Company d/b/a)	<u>Case No. GT-2005-0069</u>
AmerenUE Proposed Tariff filed under)	Tariff File No. JG-2005-0145
Tariff No. JG-2005-0145)	

APPLICATION FOR REHEARING

COMES NOW Seminole Energy Services, L.L.C. ("Seminole"), and pursuant to Section 386.500 RSMo (2000) and for its Application for Rearing in the above captioned case states as follows:

1. On August 30, 2004, AmerenUE filed a proposed tariff with an effective date of October 1, 2004, that changed the existing tariff in two ways. The first is to change the provision concerning burner tip balancing to say that burner tip balancing will be used only when it is available on conditions acceptable to AmerenUE in place of the former language which required the use of burner tip balancing whenever and wherever it is available. The other language change permits customers to form groups to balance their usage, ostensibly to allow the group to balance their usage within the group rather than each customer having to balance their usage individually.
2. On September 17, 2004, ProLiance Energy, LLC, an AmerenUE transport customer, filed

a motion to suspend the tariff.

3. On September 24, 2004, MFA Incorporated and Oneok Energy Marketing Company (an AmerenUE transportation customer and a gas marketer, respectively) jointly file a motion to suspend the tariff.

4. On September 24, 2004, Seminole also filed a motion to suspend the tariff.

5. Seminole requests the Commission to grant rehearing in Case No. GT-205-0069 because the Commission's Order is unlawful, unjust and unreasonable on the following grounds:

(a) The Commission's order is unlawful and unreasonable in that there is insufficient evidence in the record to determine exactly what service is to be offered by Panhandle Eastern Pipeline. The language change proposed by AmerenUE changes the provision concerning burner tip balancing to say that burner tip balancing will be used only when it is available on conditions acceptable to AmerenUE in place of the former language which required the use of burner tip balancing whenever and wherever it is available. The fact that AmerenUE sees a need to change this language suggests that burner tip balancing is still available but on terms that are unacceptable to AmerenUE; (b) some customers will continue to benefit from PEPL's superior "burner tip balancing" approach while other similar situated customers will be denied that approach; (c) AmerenUE's proposed tariff does not reimburse the customer for charges resulting from the transportation of excess gas so that AmerenUE will receive delivered gas supplies at a wellhead market price; (d) the proposed 5% daily imbalance factor and 10% penalty charges is difficult and inferior to the "burner tip balancing" utilized by PEPL and effectively changes the rate and charges imposed on gas transportation customers no longer eligible for burner tip balancing as a result of the change in the tariff ; (e) penalties are on a daily basis and do not consider the total volume delivered during the month or whether AmerenUE incurs penalties as a

result of the customers actions; (f) the daily tolerance of 5% is too small and has a disproportionate hardship on smaller customers; (g) AmerenUE's changed tariff imposes penalties on customers who use a monthly amount of gas equal to the volume delivered if the customer is out of balance on a daily basis; (h) the Commission's order is unlawful in that it does not contain sufficient findings of fact to support its approval of the tariff as required by *State ex rel Coffman v. Public Service Commission, WD 63133, 63134 and 63135, August 10, 2004.*

WHEREFORE, Seminole Energy Services respectfully requests the Commission, pursuant to Section 386.500 RSMo (2000) to grant rehearing of its Order approving AmerenUE's Tariff Sheets, PSC MO. No 2;

First Revised SHEET No. 13.1, Canceling Original SHEET No. 13.1,

Fifth Revised SHEET No. 14, Canceling Fourth Revised SHEET No. 14;

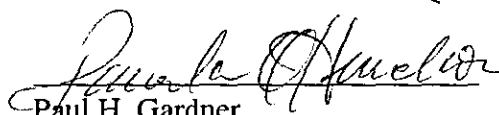
Fourth Revised SHEET No. 15, Canceling Third Revised SHEET No. 15;

Fourth Revised SHEET N. 16, Canceling Third Revised SHEET No. 16;

First Revised SHEET No. 16.1, Canceling Original SHEET No. 16.1

All in Tariff File No. JG-2005-0145, filed on August 30, 2004.

Respectfully submitted,



Paul H. Gardner

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Pamela Q. Henrickson

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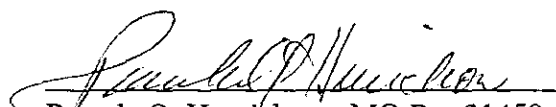
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ATTORNEYS FOR
Seminole Energy Services, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that the APPLICATION FOR REHEARING was mailed, by U.S. Mail, this 5th day of November, 2004, to all attorneys of record.



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