



Martha S. Hogerty  
Public Counsel

State of Missouri

Bob Holden  
Governor

**Office of the Public Counsel**  
Governor Office Bldg. Suite 650  
P.O. Box 7800  
Jefferson City, Missouri 65102

Telephone: 573-751-4857  
Facsimile: 573-751-5562  
Relay Missouri  
1-800-735-2966 TDD  
1-800-735-2466 Voice

August 14, 2001

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED**<sup>3</sup>  
AUG 14 2001  
Missouri Public  
Service Commission

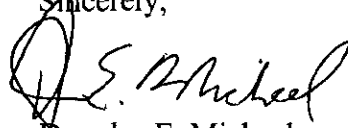
**RE: Union Electric Company d/b/a AmerenUE,**  
**Tariff No. 200200068, Case No. 67-2002-70**

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 8 copies of **Office of the Public Counsel's Motion to Suspend**. Please "file stamp" the extra-enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

  
Douglas E. Micheel  
Senior Public Counsel

DEM:kh

cc: Counsel of record

Enclosure

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the matter of the tariff filing of Union Electric	)	
Company d/b/a AmerenUE to incorporate into	)	
the Company's tariff a revised procedure for the	)	Tariff No. 200200068
the development of estimated customer natural gas	)	Case No. GT-2002- <u>70</u>
usage, and clarify and update the tariff provisions	)	
describing the Company's current process for	)	
estimating customer gas usage.		

**OFFICE OF THE PUBLIC COUNSEL'S  
MOTION TO SUSPEND**

COMES NOW the Office of the Public Counsel ("Public Counsel") and pursuant to 4 CSR 240-2.065(3) requests that AmerenUE's First Revised Sheet No. 56 and 4<sup>th</sup> Revised Sheet No. 57 (attached as Attachment A) be suspended. In support Public Counsel states:

1. On or about July 27, 2001, AmerenUE filed its proposed tariffs regarding the treatment of estimated billings for AmerenUE's customers. The proposed tariffs have a date of issue of July 30, 2001 and a proposed effective date of August 29, 2001.

2. The proposed tariffs raise numerous issues that should be resolved prior to the tariff sheets becoming effective. For example proposed tariff sheet no. 56 in section VIII C.a. contains language that customers will be deemed to be "similarly situated customers" if they are located in the same weather reporting area and have the same meter reading dates as customers whose bill is being estimated. These vague terms would allow an apartment tenant to have her usage based upon the usage of a homeowner with a larger home so long as that homeowner is located in the same weather reporting area and had the same meter reading dates. The proposed tariffs basically dictate to the customer that the method chosen by AmerenUE is the only method to be utilized to estimate a customers bill, but the proposed tariffs do not specifically setout the exact method AmerenUE

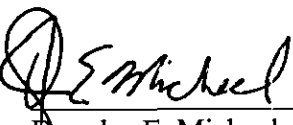
will use in determining estimated gas usage and the tariffs provide absolutely no recourse to the customer should they disagree with AmerenUE. Section VIII C.b. provides how multi-month estimated bills will be dealt with. This provision seems to indicate that customers could be receiving estimated bills for a period longer than three (3) months. Such estimated bills would be contrary to 4 CSR 240-13.020(2)(A). Moreover, Public Counsel questions the need for AmerenUE to be providing multi-month estimated bills in light of the fact that AmerenUE has installed automated meter reading devices in most if not all of its residential meters.

3. Public Counsel has propounded data requests upon AmerenUE in an attempt to better understand how the proposed tariffs would operate. Public Counsel anticipates it can resolve its conflicts with the proposed tariffs, however, Public Counsel cannot do so by the August 29, 2001 proposed effective date for tariff sheet no. 56 and 57.

WHEREFORE, Public Counsel requests that the Commission suspend AmerenUE's First Revised Sheet No. 56 and 4<sup>th</sup> Revised Sheet No. 57.

Respectfully submitted,

**OFFICE OF THE PUBLIC COUNSEL**

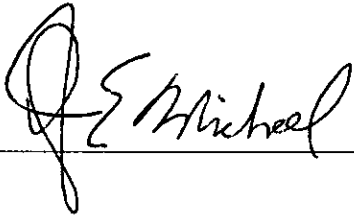
BY:   
Douglas E. Micheel, Esq. (Bar No. 38371)  
Senior Public Counsel  
P. O. Box 7800, Suite 650  
Jefferson City, MO 65102  
Telephone : (573) 751-5560  
Fax: (573) 751-5562  
dmicheel@mail.state.mo.us

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been faxed, mailed or hand-delivered to the following counsel of record on this 14th day of August, 2001:

General Counsel  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City MO 65102

Ronald Evans  
Ameren Services  
One Ameren Plaza  
P. O. Box 66149 (MC 1300)  
St. Louis MO 63166-6149



---

## UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

### VIII. Billing Practices

#### A. Monthly Billing Periods

Company will render bills over twelve (12) monthly billing periods in a year, with each bill based upon the service used between regularly scheduled meter readings. While Company's work schedules provide for the orderly reading of all meters over intervals of approximately 30 days, holidays, weekends, inclement weather and other operating constraints may cause the billing interval to vary during various portions of the year.

#### B. Inaccessible Meters

Where a meter is inaccessible to the meter reader during scheduled working hours on repeated occasions, such that a customer must arrange for meter reading by appointment to avoid discontinuance of service, the customer may at his own expense have Company relocate the meter to an accessible location, if feasible.

#### \*C. Estimated Bills for Full Billing Periods

Monthly bills may be rendered to the Company's natural gas customers based upon estimated gas usage (which may include the use of readings furnished by the customer), where conditions reasonably beyond the control of the Company prevented it from obtaining actual meter readings. Such estimated bills will be determined as follows:

##### a. Single-Month Estimated Bills

A single billing month's estimated natural gas usage will be determined on the basis of the customer's prior month's usage, adjusted by a factor reflecting the difference in weather during the immediately prior and current monthly billing periods. This adjustment factor will be based upon the ratio of the current month to the prior month's natural gas usage of similarly situated customers for which the Company has obtained actual meter readings. Such customers will be located within the same weather reporting area and have the same meter reading dates as the customer whose bill is being estimated.

Where the aforementioned method of estimating natural gas usage cannot be utilized, other reasonable methods may be employed to estimate the gas usage at the customer's premises. These methods may utilize the metered gas usage

\* Indicates Change

Attachment A

DATE OF ISSUE July 30, 2001

DATE EFFECTIVE August 29, 2001

ISSUED BY C. W. Mueller

President & CEO

St. Louis, Missouri

Name of Officer

Title

Address

## UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

### VIII. Billing Practices (Cont'd.)

at the premises from earlier months, customer supplied meter readings; comparable customer gas usage, or other general gas consumption information.

#### \*b. Multiple-Month Estimated Bills

In instances of a non-recording meter, requiring the estimation of any customer's natural gas usage for periods of two or more billing months, such estimated usage may be developed considering a combination of several factors. These factors include the actual gas usage at the customer's premises from prior periods, the number of days in the prior and current billing periods, and current and historic weather data from the reporting area within which the customer's premises is located. Comparable customer usage or other general gas consumption information may be used to estimate the gas usage at the customer's premises, where no prior gas usage data is available, or in instances where the customer's gas service is provided under the provisions of a non-residential rate schedule.

#### D. Estimated Initial and Final Bills

The Company will normally be granted access to customer's premises for purposes of obtaining initial and final meter readings and the associated connection and disconnection of gas service. However, where such access cannot be obtained, or other conditions beyond the control of Company prevent obtaining an actual meter reading, estimated initial and final bills may be rendered by Company. When obtained, meter readings will be adjusted to customer's service responsibility date. However, customer will be responsible for all gas utilized until access is provided to Company for obtaining actual meter readings and the disconnection of gas service. No final bill will be rendered where the amount of the bill for gas usage is less than \$1.00, except for those accounts where a customer deposit is being refunded to customer.

#### E. Budget Billing Plan

Customers who are billed under the Residential Service Classification or General Service Classification with postcard billing and, at the Company's option, certain eleemosynary customers may elect to be billed and pay for all service under Company's Budget Billing Plan provided customer shall have satisfied Company's credit requirements. The provisions of the Budget Billing Plan are as follows:

\* Indicates Change

DATE OF ISSUE	<u>July 30, 2001</u>	DATE EFFECTIVE	<u>August 29, 2001</u>
ISSUED BY	<u>C. W. Mueller</u>	<u>President &amp; CEO</u>	<u>St. Louis, Missouri</u>
	<small>Name of Officer</small>	<small>Title</small>	<small>Address</small>