## MEMORANDUM

To: Missouri Public Service Commission Official Case File, Case No. GT-2008-0088,

Tariff File No. YG-2008-0190, Union Electric Company d/b/a AmerenUE

From: Thomas M. Imhoff, Energy Department – Tariffs/Rate Design

/s/ Thomas M. Imhoff 09/27/07 /s/ Lera Shemwell 09/27/07 Utility Operations Division/Date General Counsel's Office/Date

Subject: Staff Recommendation to Approve Tariff Sheet Filed to Reflect a Change in the

Installation and Associated Costs for Excess Flow Valves at Customer Residences

and on a Motion for Expedited Treatment

Date: September 27, 2007

On September 21, 2007, Union Electric Company d/b/a AmerenUE (UE or Company) filed a tariff sheet proposing to allow UE to install Excess Flow Valves (EFVs) at customer residences at no charge in the event that UE is installing a new service line or a scheduled replacement of a service line. On September 21, 2007, UE filed a motion for expedited treatment to propose an effective date no later than October 5, 2007, which is less than thirty (30) days notice.

UE filed this change early to implement the requirements of the Pipeline Inspection, Protection, Enforcement and Safety (PIPES) Act of 2006, that will make it a requirement to install EFVs. UE is in the process of a large service line replacement project and believes it is reasonable to begin installing EFVs on these lines without charging its customers. This change will have no negative effect on UE customers, and would need to be implemented by June 1, 2008 to comply with the Federal PIPES Act. However, if a customer whose service line is not scheduled for replacement requests EFV installation, UE will charge \$900. Customers currently pay UE \$900 for replacement of an EFV if it fails.

The Commission's Energy Department Tariffs/Rate Design Staff (Staff) has reviewed this filing and UE's motion for expedited treatment and has determined that the tariff sheet has been filed in compliance with Commission rules and regulations. Staff has no objection to the proposed changes to UE's tariff relating to the EFVs. The Staff has verified that the Company has filed its annual report and is not delinquent on any assessment. Staff has reviewed this filing and is not aware of any issue currently pending before the Commission that affects, or is affected by, this filing.

Staff agrees with UE's Motion for Expedited Treatment and, therefore, recommends that the following tariff sheet, as filed on September 21, 2007 with a rerquested effective date of October 5, 2007 go into effect:

P.S.C. MO. No. 2

## BEFORE THE PUBLIC SERVICE COMMISSION

## OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a AmerenUE's Amendment of its Misc. Tariff, Schedule No. 2, Miscellaneous Charges, 2 <sup>nd</sup> Revised Sheet No. 20	) ) ) )	Case No. GT-2008-0088
AFFIDAVIT OF THOMAS M. IMHOFF		
STATE OF MISSOURI ) ) ss COUNTY OF COLE )		
Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.		
	Th	Thomas M. Imhoff
Subscribed and sworn to before me this 28 day of September, 2007.		
SUSAN L. SUNDERMEYER My Commission Expires September 21, 2010 Callaway County Commission #06942086	Susa	Notary Public
My commission expires 9-21-10		