

**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)
Schedule No. 5, Variances and)
Promotional Practices, 4th Revised Sheet)
No. 194 and 6th Revised Sheet No. 195)

Case No. ET-2008-0131
Tariff No. JE-2008-0274

STAFF RECOMMENDATION TO APPROVE TARIFF SHEETS

Comes now the Staff of the Missouri Public Service Commission and for its recommendation states:

1. On October 2, 2007, Union Electric Company d/b/a AmerenUE, (AmerenUE) filed two (2) proposed tariff sheets designed to implement a pilot program whereby eligible residential customers who have backup generation may receive a payment of up to fifty percent (50%), but not more than \$500 dollars, to defray costs they incur in installing an approved connection system. Those tariff sheets bore a proposed effective date of November 2, 2007, and the Commission assigned them tariff tracking no. JE-2008-0209.

2. AmerenUE withdrew the tariff sheets on October 26, 2007, and filed new tariff sheets for the same pilot program, but with the addition of a program evaluation plan, together with a motion seeking their expedited approval. The Commission assigned both the motion and new tariff sheets to Case No. ET-2008-0131 and also tracking no. JE-2008-0274 to the tariff sheets.

3. On October 29, 2007, the Commission ordered its Staff to file by 1:00 p.m., October 31, 2007, the Staff's recommendation on AmerenUE's proposed tariff sheets filed October 26, 2007.

4. In the attached Memorandum (Appendix A), the Missouri Public Service Commission Energy Department Staff (Staff) recommends that the Commission issue an Order that both approves the following proposed tariff sheets, as filed on October 26, 2007, and, for good cause shown, makes them effective on November 2, 2007, rather than November 25, 2007:

P.S.C. Mo. SCHEDULE NO. 5

4th Revised SHEET NO. 194 Cancelling 3rd Revised SHEET NO. 194

6th Revised SHEET NO. 195 Cancelling 5th Revised SHEET NO. 195

5. The Staff has reviewed the tariff sheets AmerenUE filed and the pilot program includes the following features:

- a. Customer rebate toward the costs associated with installation by an AmerenUE approved program provider of an AmerenUE approved safe connection system;
- b. Available on a first come, first served basis to residential customers served on the Service Classification No. 1(M)–Residential Service Rate that elect to install a safe connection system for operating a backup generator;
- c. Rebate will be up to 50% of installed safe connection system cost not to exceed \$500;
- d. Rebate applies only to the installation of an approved safe connection system. It does not apply to any material or labor associated with the generator installation
- e. Customer must provide proof of installation by an AmerenUE approved program provider and cost of an approved safe connection system within sixty days of installation;
- f. Rebate request period is between November 2, 2007 and July 31, 2009;
- g. Rebates will be limited to one rebate per premise, and
- h. Rebate aggregate total amount shall not exceed \$1,000,000.

Further, a list of AmerenUE approved program providers will be made available to customers and these approved program providers must:

- a. Meet certain performance and experience requirements;
- b. Meet certain liability and financial requirements; and

c. Comply with local codes and the National Electrical Safety Code.

5. Section 393.140(11), RSMo 2000, requires that proposed changes to tariffs not go into effect with less than thirty (30) days' notice, unless the Commission determines otherwise for "good cause shown." The proposed tariff sheets will allow customers to take advantage of AmerenUE's proposed payment soon after they become effective, the program in these tariff sheets is substantially the same as the program AmerenUE originally proposed on October 2, 2007, and Staff needs no additional time to further review this tariff; therefore, the Staff believes that making the tariff sheets effective on less than thirty (30) days' basis will cause no harm. These considerations show the good cause required by section 393.140(11), RSMo 2000, for the Commission to determine and order that the tariff sheets go into effect on less than thirty (30) days' notice.

6. The Staff has verified that AmerenUE has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

WHEREFORE, the Staff recommends that the Commission issue an order that both approves the following proposed tariff sheets, as filed on October 26, 2007, and, for good cause shown, makes them effective on November 2, 2007, rather than November 25, 2007:

P.S.C. Mo. SCHEDULE NO. 5

4th Revised SHEET NO. 194 Cancelling 3rd Revised SHEET NO. 194

6th Revised SHEET NO. 195 Cancelling 5th Revised SHEET NO. 195

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy General Counsel
Missouri Bar No. 35512

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all counsel of record this 31st day of October 2007.

/s/ Nathan Williams

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. ET-2008-0131, Tariff No. JE-2008-0274
Union Electric Company d/b/a AmerenUE

FROM: Dan Beck, Utility Regulatory Engineering Supervisor
Tom Imhoff, Rate & Tariff Examination Supervisor
James Watkins, Manager, Economic Analysis
Mack McDuffey, Rate & Tariff Examiner II

/s/ Daniel I. Beck 10/31/07
Energy Department / Date

/s/ Nathan Williams 10/31/07
General Counsel's Office / Date

SUBJECT: Staff Recommendation For **Approval** Of Tariff Sheets Filed To Add Safe
Connection Of Generation Pilot Program

DATE: October 31, 2007

On October 2, 2007, Union Electric Company d/b/a AmerenUE (AmerenUE or Company), of St. Louis, Missouri filed with the Commission two (2) tariff sheets with a proposed effective date of November 2, 2007, Tariff Tracking No. JE-2008-0209. On October 26, 2007, AmerenUE withdrew these tariff sheets and filed new tariff sheets, Tariff Tracking No. JE-2008-0274, together with a Motion For Expedited Treatment in Case No. ET-2008-0131.

This filing proposes to add the Safe Connection Of Generation Pilot Program (Pilot Program) that is designed to support and assist residential customers' choice of a safe connect system for the operation of backup electric generation equipment. Features of the Pilot Program include:

1. Customer rebate toward the costs associated with installation by an AmerenUE approved program provider of an AmerenUE approved safe connection system.
 - a. Available on a first come, first served basis to residential customers served on the Service Classification No. 1(M)–Residential Service Rate that elect to install a safe connection system for operating a backup generator.
 - b. Rebate will be up to 50% of installed safe connection system cost not to exceed \$500.
 - c. Rebate applies only to the installation of an approved safe connection system. It does not apply to any material or labor associated with the generator installation.
 - d. Customer must provide proof of installation by an AmerenUE approved program provider and cost of an approved safe connection system within sixty days of installation.
 - e. Rebate request period is between November 2, 2007 and July 31, 2009.
 - f. Rebates will be limited to one rebate per premise.
 - g. Rebate aggregate total amount shall not exceed \$1,000,000.
2. A list of AmerenUE approved program providers will be made available to customers. These approved program providers must:

- a. Meet certain performance and experience requirements.
- b. Meet certain liability and financial requirements.
- c. Comply with local codes and National Electrical Safety Code.

This tariff filing is identical to the version AmerenUE filed on October 2, 2007, with one exception. A section was added titled, "Pilot Program Evaluation." This section outlines the scope of the evaluation of this Pilot Program designed to assess the strengths and weaknesses of the program after it terminates. Because this tariff filing is essentially the same as that proposed on October 2, 2007, it includes program evaluation, and AmerenUE has made plans to roll out this program on November 2, 2007, Staff recommends that the Commission grant AmerenUE's request for expedited treatment.

The Missouri Public Service Commission Energy Department Staff (Staff) has reviewed the filed tariff sheets to add AmerenUE's Safe Connection Of Generation Pilot Program. Under the circumstances presented, Staff recommends that the Commission **approve** the following proposed tariff sheets, as filed on October 26, 2007, to become effective on November 2, 2007, with less than 30 day's notice for good cause shown pursuant to Section 393.140(11) RSMo 2000, as requested by AmerenUE in its Motion For Expedited Treatment.

P.S.C. Mo. SCHEDULE NO. 5

4th Revised SHEET NO. 194 Cancelling 3rd Revised SHEET NO. 194

6th Revised SHEET NO. 195 Cancelling 5th Revised SHEET NO. 195

The Staff has verified that this Company has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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

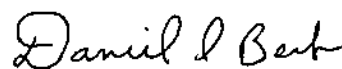
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Case No. ET-2008-0131
JE-2008-0274

AFFIDAVIT OF DANIEL I. BECK

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Daniel I. Beck, 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 given by 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.

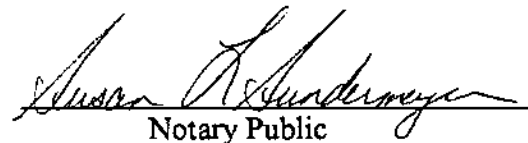


Daniel I. Beck

Subscribed and sworn to before me this 31st day of October, 2007.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086


Notary Public

My commission expires 9-21-10