

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

In the Matter of Union Electric Company)
d/b/a AmerenUE's Purchased Gas) Case No. GR-2008-0366
Adjustment (PGA) Factors.)

**MOTION FOR WAIVER OF TARIFF PROVISION
AND FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company) and for its *Motion for Waiver of Tariff Provision and for Expedited Treatment*, states as follows:

1. Concurrent with this filing, AmerenUE is filing revised tariff sheets to decrease its Regular Purchased Gas Adjustment (RPGA) factor for its Missouri service area.
2. AmerenUE requests expedited treatment of this filing, so that the RPGA factor can take effect on November 1, 2008. Approval of this filing on an expedited basis will be beneficial to AmerenUE and its customers because (a) it will provide reduced natural gas rates for the impacted customers; (b) it will allow AmerenUE to change its RPGA factors consistent with the beginning of the November billing month; and (c) it will permit a closer matching of rates charged to customers with the costs AmerenUE is paying to its suppliers.
3. Specifically, AmerenUE is asking the Missouri Public Service Commission (Commission) to waive a portion of Section II(B)(1) of its P.S.C. 5th Revised Sheet No. 24, a part of Rider A, the Purchased Gas Adjustment Clause. That section provides as follows: "For each natural gas supply purchased during the base period multiply the *number of units of demand purchased* during the base period by their respective charge(s) in effect on the first day of the

filing month and divide by firm sales volumes during the base period,” (emphasis added.) AmerenUE requests a waiver of the requirement to use the *number of units of demand purchased* in this calculation. This is the same waiver request which was approved by the Commission in GR-2008-0366.

4. As the Commission is aware, AmerenUE serves the Rolla area customers with gas transported on MoGas Pipeline, LLC (MoGas).¹ AmerenUE has entered into a contract with MoGas for a volume that is less than the amount contracted for previously. AmerenUE began taking gas under this contract on June 1, 2008, which falls in the middle of this ACA period. Accordingly, using a historical number of units purchased will result in an inaccurate calculation. Instead, AmerenUE proposes to use the new contract maximum demand quantity of 5,860 MMBtu as if that demand level had been taken the entire year.

5. The new rate sheets have been filed using this alternate methodology and bear an effective date of November 1, 2008. Accordingly, AmerenUE requests the Commission grant this *Motion for Waiver of Tariff Provision and for Expedited Treatment* no later than November 1, 2008.

6. This pleading and the related tariff filing were filed as soon as they could have been given the volatility of the natural gas markets, and the calculations AmerenUE had to perform to support an RPGA factor adjustment.

¹ MoGas was formerly Missouri Gas Company, LLC pipeline, which together with affiliates Missouri Pipeline Company, LLC and Missouri Interstate Gas, LLC, obtained authority from the Federal Energy Regulatory Commission (FERC) to become a single FERC regulated, interstate pipeline named MoGas Pipeline, LLC.

WHEREFORE, for the reasons stated herein, AmerenUE respectfully requests that the Commission waive the above cited section of its natural gas tariff sheets and grant expedited treatment so that the tariffs are effective no later than November 1, 2008.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Waiver of Tariff Provision and for Expedited Treatment was served on the following parties via electronic mail (e-mail) on this 17th day of October, 2008.

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