



1901 Gratiot Street. St. Louis

(314) 554-2554

February 3, 1987

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MO. PUBLIC SERVICE COMMISSION

Agathen

Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

AO-87-48

Dear Mr. Hubbs:

Enclosed for filing are the original and fourteen copies of a Verified Motion of Union Electric Company For Waiver of Filing The Calendar Year 1986 Cost of Service Data.

Kindly acknowledge receipt by date stamping the duplicate copy of this letter and returning it to me in the enclosed self-addressed stamped envelope.

Yours truly,

Paul A. Agathen
General Attorney

PAA/lmj

Enclosures

cc w/encl: All parties

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Union Electric Company respectfully requests a waiver for filing the 1986 calendar year data for its electric business, as required by the Commission's November 3, 1986 Order Establishing Docket. In support of this Motion the Company states:

1. The Commission's November 3 Order requires, inter alia, that utilities file a jurisdictional cost of service study based on 1986 data, adjusted to reflect the Tax Reform Act. The due date for this information, as revised by subsequent Commission Order, is March 2, 1987.

2. The filing of this data, for the Company's electric business, should be waived for the following reasons:

51.

assisting Staff, particularly in responding to their numerous data requests, will make it difficult if not impossible to continue that work and also compile the Company's own 1986 cost of service study before March 2.

(b) To a great extent, if the Company filed the 1986 cost study on March 2, it would simply duplicate the work now being done by the Staff. It would save considerable time and effort if the Company (assuming it must file anything) simply submits adjustments to the Staff study now being compiled.

(c) In light of the fact that the Company has volunteered to promptly reflect the impact of the Tax Reform Act on its electric rates, there is no reason to file the 1986 data in this proceeding anyway. If any such data is deemed relevant in a subsequent complaint case, based upon factors other than the Tax Reform Act, then such a study could be ordered as part of that subsequent case. However, there is no reason at this point to order such a study in this case on the ground that it may be helpful later in a different proceeding where the subject matter of this case is not even in issue.

3. On a related matter, the Commission's Order of January 30, 1987 directed all utilities to file data "setting forth with specificity the offsetting cost increases or other factors which cause the companies to believe that their rates are not excessive in spite of the TRA..." Inasmuch as the Company has agreed to the rate reduction and made no mention of offsetting cost increases, it assumes it need not file a response to this part of the Commission's Order.

For the above reasons, the Company respectfully requests that it be granted a waiver for filing the 1986 cost study for its electric business.

Respectfully submitted,

UNION ELECTRIC COMPANY

by Paul A. Agathen
Paul A. Agathen
Attorney for
Union Electric Company
P.O. Box 149
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(314) 554-2554

VERIFICATION

Robert O. Piening, being duly sworn, states that the facts set forth in this Motion are true to the best of his information and belief.

Robert O. Piening
Robert O. Piening

Subscribed and sworn to before me this 3rd day of January, 1987.

Mary C. Guinn
MARY C. GUINN
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS CITY
MY COMMISSION EXPIRES JUNE 16, 1990

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was mailed this 3rd day of January, 1987, to Staff and to all other parties listed on the Commission's Order of January 30, 1987.

Paul A. Agathen
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