

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

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File)	
Tariffs Increasing Rates for Electric)	Case No. ER-2008-0318
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

**UNION ELCTRIC COMPANY d/b/a AMERENUE'S RECOMMENDATION
FOR NOTICE AND LOCAL PUBLIC HEARINGS**

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company), and in response to the Commission's April 7, 2008 Order Directing Notice, Suspending Tariff, Setting Hearings and Directing Filings, as modified by the Commission's April 24, 2008 Order Rescheduling Prehearing Conference, hereby files its recommendation respecting notice and local public hearings and, in this regard, states as follows:

1. In the Company's last rate case, which was a combined electric and gas rate case, the Commission conducted an unprecedented 16 separate local public hearings. As discussed further below, this was a far greater number of local public hearings than the Commission has ever required for any other public utility in the state. While the Company supports holding a sufficient number of public hearings to give customers a fair opportunity to provide their views concerning AmerenUE's requested rate increase, the Company respectfully submits that this fair opportunity can be afforded to customers with far fewer local public hearings in this case.

2. Consider the experience from the last rate case. A total of 165 individuals testified at the 16 local public hearings. Notably, 109 - approximately two-thirds - of those individuals testified at just four of the 16 local public hearings - the two in St. Louis City and the two in St. Louis County. This means that an average of between only four and five individuals testified at the remaining 12 local public hearings. Indeed, not a single person testified at two of

the local public hearings (Rolla and Kirksville), just two persons testified at each of the Jefferson City and Excelsior Springs local public hearings, and only three persons testified at the Moberly hearing; i.e., just a total of seven persons testified at these five hearings. Finally, two of the local public hearings were held in locations where AmerenUE provides only gas service (Columbia and Rolla), which at the very least should eliminate two of the local public hearing sites from the last rate case.

3. It is also noteworthy that far fewer local public hearings were more than adequate in several recent large company rate cases, including in Kansas City Power & Light Company's last rate case (only four hearings), Empire's current rate case (just two hearings), Missouri Gas Energy's 2004 rate case (four hearings), and Aquila's last combined electric and steam rate cases for both its MPS and SJLP divisions (four hearings).

4. One of the purposes of holding local public hearings is to ensure that the interest of the general public is adequately represented before the Commission in rate cases. In AmerenUE's electric rate case, there are a dozen parties (other than AmerenUE), at least three of which represent the interests of small, individual members of the general ratepaying public: the Office of the Public Counsel, AARP, and the Consumers Council of Missouri. There is little doubt that the public will be heard, and fully represented, in this rate case, without the necessity of holding any number approaching 16 local public hearings.

5. Moreover, recent technological advances provide other ways for the public to express their views, including direct communication with the Office of the Public Counsel via e-mail, by telephone, or otherwise, and the submission of comments via the Commission's Electronic Filing and Information System (EFIS). Indeed, as of this date, 106 persons have utilized the Commission's public comment mechanism via EFIS.

6. This rate case is also far different than the last combined electric and gas rate case. As the Commission is aware, large numbers of AmerenUE customers, principally in St. Louis City and St. Louis County and areas nearby, suffered extended outages as a result of three different and very severe storms occurring in July and November/December 2006. The vast majority of individuals who did testify at the well-attended local public hearings in St. Louis City and St. Louis County testified about their understandable frustrations arising from being without electric service in the aftermath of these storms. Indeed, 92% of the service-related complaints lodged by those testifying at these hearings were related to the 2006 storms.

7. While storm-related outages still occur from time to time, the unprecedented outages in 2006 have, fortunately, not been repeated in 2007 and 2008. To the extent a greater number of local public hearings were held in the last case due in part to the groundswell of frustration that existed among some of AmerenUE's customers at that time, those same considerations do not exist in this case.

8. A large number of local public hearings creates unnecessary expenses for the Commission and the parties, and will also create a substantial and unwarranted burden on the Commission, its Staff and other parties, particularly given the parties' and the Commission's schedule over the next several months.¹ Local public hearings should be held after direct testimony is filed so that the key positions of the parties are known at the time of the hearings. This means that local public hearings almost certainly need to be held during one of the busiest periods of the rate case, when parties will be meeting for technical and settlement conferences designed to correct data errors and to narrow and perhaps resolve issues, conducting discovery respecting the direct cases filed by a dozen parties, and preparing rebuttal testimony.

¹ Evidentiary hearings are expected in three different major rate cases this Fall, involving Trigen, Missouri-American Water Company and in this case.

9. Based upon the foregoing, AmerenUE suggests the Commission schedule a total of six local public hearings, as follows: one in St. Louis City, one in St. Louis County, one in Wentzville, one in Jefferson City, one in Cape Girardeau, and one in Mexico. Six local public hearings strikes an appropriate balance between affording customers an opportunity to address the Commission and the burdens and very limited benefit, if any, associated with holding even more hearings.

10. The Commission's April 7 and April 24 Orders also asked for a recommendation regarding a customer notice to be included in AmerenUE's bills notifying customers of the local public hearings that will be held. AmerenUE included a proposed customer notice at page 1 in Schedule MJL-E4 to the Direct Testimony of AmerenUE witness Martin J. Lyons, Jr. as part of the minimum filing requirements for AmerenUE's requested fuel adjustment clause, and has attached that page hereto. The only material difference between the proposed customer notice attached hereto and the customer notice approved by the Commission in the AmerenUE's last rate case is the description of AmerenUE's fuel adjustment clause, which differs in certain respects from the fuel adjustment clause proposed in the Company's prior rate case. The Company recommends approval of the attached proposed customer notice.

WHEREFORE, AmerenUE respectfully suggests that the Commission schedule six local public hearings as follows: one in St. Louis City, one in St. Louis County, one in Wentzville, one in Jefferson City, one in Cape Girardeau, and one in Mexico, and that the Commission approve AmerenUE's proposed customer notice.

Respectfully submitted,

Dated: May 20, 2008

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 20th day of May, 2008.

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MINIMUM FILING REQUIREMENTS

(A) An example of the notice to be provided to customers as required by 4 CSR 240-20.090(2)(D);

NOTICE

AmerenUE has filed revised tariff sheets with the Missouri Public Service Commission (PSC) which would increase the company's electric service revenues by approximately \$250.8 million. For the average residential customer the proposed increase would be approximately \$8.66 per month. AmerenUE's rate filing includes a request to implement a fuel adjustment clause. A fuel adjustment clause, if approved by the Commission, would allow 95% of the net increases or decreases in fuel and purchased power costs less off-system sales revenues occurring after base electric rates are set by the pending rate case to be passed through to customers as a separate line on customer's bills. Ninety-five percent of the increases in net fuel and purchased power costs less off-system sales revenues above base electric rates would be applied to customer bills via a separate and additional charge and 95% of the net decreases would be applied to customer bills via a separate credit.

Public comment hearings have been set before the PSC as follows:

[To be determined by the Commission]

If you are unable to attend a live public hearing and wish to make written comments or secure additional information, you may contact the Office of the Public Counsel, P.O. Box 2230, Jefferson City, Missouri 65102, telephone (573) 751-4857, email opcservice@ded.mo.gov or the Missouri Public Service Commission, Post Office Box 360 Jefferson City, Missouri 65102, telephone 800-392-4211, email pscinfo@psc.mo.gov. The Commission will also conduct an evidentiary hearing at its offices in Jefferson City during the weeks of _____ through _____, beginning at _____ a.m. The hearings and local public hearings will be held in buildings that meet accessibility standards required by the Americans with Disabilities Act.

If a customer needs additional accommodations to participate in these hearings, please call the Public Service Commission's Hotline at 1-800-392-4211 (voice) or Relay Missouri at 711 prior to the hearing.

The above notice is very similar (except for the figures included therein, deletion of references to a natural gas case, and deletion of hearing dates and locations) to the notice approved by the Commission in the Company's last rate proceeding (Case No. ER-2007-0002). The Company requests the Commission to adopt the same.