UNION ELECTRIC COMPANY
1901 GRATIOT STREET - ST. LOUIS

MAILING ADDRESS
P.O. BOX 149
ST. LOUIS, MO. 63166

October 19, 1982

Mr. Harvey G. Hubbs
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. EO-82-140

Dear Mr. Hubbs:

Enclosed for filing in the above case are the original and fourteen copies of a Motion to Clarify Order Lifting Suspension.

Yours truly,

Paul A. Agathen
Attorney

PAA/jp

Enclosures

cc: w/encl.: Messrs. James M. Fischer
Jim Ketter

STATE OF MISSOURI

PUBLIC SERVICE COMMISSION

In the matter of Union Electric Company of St. Louis, Missouri, for compliance with 4 CSR 240-20.060, cogeneration tariffs, for customers in the Missouri service area of the Company.	)))))	Case No. EO-82-140

Motion to Clarify Order Lifting Suspension

Comes Now Union Electric Company, ("Company"), and respectfully requests a clarification of the Order Lifting Suspension, issued in the above case on October 13, 1982. In support of this request, Company states:

1. The tariffs in question are for cogeneration rates, and were filed by the Company on April 9, 1982 as substitute tariffs for those filed on October 15, 1981 in compliance with Commission Rule 4 CSR 240-20.060.

2. Commission Rule 4 CSR 240-20.060, paragraph (3)(A)3 provides in part that cogeneration tariffs originally submitted to the Commission shall be updated and revised on or before January 15, 1983. The Company's substitute tariffs filed on April 9, 1982 did reflect current cost data, and the Company had therefore requested in its earlier Motion that the substitute tariff sheets be considered as complying with the January 15, 1983 update requirement.

3. In its Order Concerning Motion to Substitute, dated May 14, 1982, the Commission deferred a ruling on the Company's request to consider the revised tariffs as in compliance with the January 15, 1983 update. (Order, p. 3). The Order Lifting Suspension likewise did not address this aspect of the Company's Motion, and thus the matter of the January 15, 1983 update is still pending.

(6)

4. Inasmuch as the cogeneration tariffs were recently updated already, as indicated above, and inasmuch as the approved tariffs would only have been in effect for approximately three months prior to the January 15, 1983 update, and inasmuch as no customers have requested to provide electric energy to the Company on cogeneration tariffs, (see attached affidavit), the Company respectfully submits that it would be beneficial to all concerned to delay any additional revision in the tariffs until the next regularly scheduled update, pursuant to the Commission's Rules and Regulations.

Wherefore, the Company respectfully requests that the Commission clarify its Order Lifting Suspension by an additional provision stating that the approved tariffs eliminate the necessity of an additional update on or before January 15, 1983.

Respectfully submitted,

Paul A. Agathen

Charles A. Bremer

Charles A. Bremer
Attorneys for
Union Electric Company

1901 Gratiot Street
St. Louis, MO 63103
(314) 554-2554, 554-2179

Dated: October 19, 1982

Certificate of Service

I hereby certify that a copy of the foregoing document was mailed this 21st day of October, 1982, to the Public Counsel.

Paul A. Agathen

Paul A. Agathen

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Affidavit

R. A. Kelley, being first duly sworn, states:

My name is R. A. Kelley. I am the same R. A. Kelley who testified on behalf of Union Electric Company in Commission Case No. EX-81-116, in the matter of the proposed rulemaking on cogeneration.

One of my responsibilities in the Corporate Planning function at Union Electric is to coordinate matters related to cogeneration. To the best of my knowledge, the Company has not had any request to provide electric service to the Company under cogeneration tariffs in Missouri.

R. A. Kelley

Subscribed and sworn to before me this 20th day of October, 1982.

Margaret S. Heida

MARGARET S. HEIDA
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES JANUARY 2, 1986