## 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-
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 one of its Missouri service areas, the area commonly referred to as the "Rolla area." AmerenUE is also filing revised tariff sheets to increase the RPGA factors for its remaining Missouri service areas; however, this motion does not apply to those tariff sheets.
- 2. AmerenUE hereby requests expedited treatment of this filing, so that the Rolla area RPGA factor can take effect on June 1, 2008. Approval of this filing on an expedited basis will be beneficial to AmerenUE and its Rolla area 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 June 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. 5<sup>th</sup> 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.

- 4. As the Commission is aware, AmerenUE serves the Rolla area customers with gas transported on Missouri Gas Company, LLC's pipeline. Missouri Gas Company, LLC, Missouri Pipeline Company, LLC and Missouri Interstate Gas, LLC, all affiliates, have filed an application at the Federal Energy Regulatory Commission (FERC) to become a single FERC regulated, interstate pipeline named MoGas Pipeline, LLC (MoGas). AmerenUE has entered into a contract effective on the later of June 1, 2008 or the date that FERC allows the pipelines to begin operation as a single, FERC regulated interstate pipeline. The new contract is for a volume that is less than the amount contracted for previously. 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.
- 5. The new rate sheets for the Rolla area have been filed using this alternate methodology and bear an effective date of June 1, 2008. Accordingly, AmerenUE requests the Commission grant this *Motion for Waiver of Tariff Provision and for Expedited Treatment* no later than May 31, 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.

WHEREFORE, for the reasons stated herein, AmerenUE respectfully requests that the Commission waive the above cited section of its natural gas tariff sheets no later than May 31, 2008.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a AmerenUE

Wendy K. Tatro

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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 15th day of May, 2008.

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