

VIA FEDERAL EXPRESS

August 20, 1999

FILED

AUG 23 1999

Missouri Public
Service Commission



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman Building
301 W. High Street, 7-N
P.O. Box 360
Jefferson City, MO 65101

Re: Missouri Public Service Commission
Case No. GR-99-315

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding are an original and fourteen (14) copies of Union Electric Company's Statements of Position On Disputed Issues.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Sincerely,

A handwritten signature in black ink, appearing to read "RKE", written over a horizontal line.

Ronald K. Evans
Managing Associate General Counsel

RKE:rld
Enclosures
cc: All parties of record

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Union Electric Company's Statements of Position On Disputed Issues in Missouri Public Service Commission Case No. GR-99-315, have been sent by overnight delivery on August 20, 1999.

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Ronald K. Evans

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

AUG 23 1999

Missouri Public
Service Commission

In the matter of Laclede Gas Company's)
Tariff to Revise Natural Gas Rate Schedules.)

Case No. GR-99-315

UNION ELECTRIC COMPANY'S
STATEMENTS OF POSITION ON DISPUTED ISSUES

Union Electric Company d/b/a AmerenUE, by and through its counsel, and pursuant to the Order entered by the Commission in this proceeding on April 29, 1999, as modified on June 7, 1999, submits the following statements of position on the Proposed List of General Issues filed by the Commission Staff on July 19, 1999 and on an additional tariff issue not identified on such Proposed List. AmerenUE offers no position with respect to issues on the Staff's Proposed List which are not addressed below.

Rate Design Issues

Class Cost of Service:

AmerenUE's Position: AmerenUE supports Laclede Gas Company's (Laclede) proposed General Service (GS) rate billing demand concept, but submits that the overall design of such GS rate is flawed in the following respects: (i) it is not based on a proper determination of customer winter peak season billing demands and (ii) it does not reflect the appropriate seasonal differential.

Gas (Supply) Cost Removal From Base Rates:

AmerenUE's Position: AmerenUE submits that all of Laclede's gas supply costs should be removed from Laclede's base rates and recovered through its Purchased Gas Adjustment (PGA) clause. Notwithstanding the vehicle for recovery of gas supply costs, AmerenUE submits that the demand component of such costs should be seasonally differentiated.

Seasonal Air Conditioning/Structure:

AmerenUE's Position: AmerenUE opposes Laclede's proposed Seasonal Air Conditioning Service Rate for the following reasons: (i) Laclede has not demonstrated a need for such special rate, separate from its GS Rate and (ii) the structure of such rate is flawed as it is not cost based and includes an improper cost subsidy.

Tariff Issues


Tariff Description of Service Territory (this issue was not included in Staff's Proposed List of Issues but appears in the testimony of certain parties):

AmerenUE's Position: AmerenUE concurs with Laclede that the Staff's proposal to require a legal description (township, section and range numbers) by county of Laclede's service territory in its tariff is unnecessary and burdensome.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By



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Dated: August 20, 1999