



Martha S. Hogerty
Public Counsel

State of Missouri

Bob Holden
Governor

Office of the Public Counsel
Governor Office Bldg. Suite 650
P.O. Box 7800
Jefferson City, Missouri 65102

Telephone: 573-751-4857
Facsimile: 573-751-5562
Relay Missouri
1-800-735-2966 TDD
1-800-735-2466 Voice

September 24, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³

SEP 24 2001

Missouri Public
Service Commission

**RE: Union Electric Company d/b/a AmerenUE,
Case No. GT-2002-70**

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 8 copies of **Public Counsel's Request to Further Suspend Tariff and Request for Hearing**. Please "file stamp" the extra-enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

Douglas E. Micheel
Senior Public Counsel

DEM:kh

cc: Counsel of record

Enclosure

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

FILED³

SEP 24 2001

Missouri Public
Service Commission

In the matter of the tariff filing of Union Electric)
Company d/b/a AmerenUE to incorporate into)
the Company's tariff a revised procedure for the)
the development of estimated customer natural gas)
usage, and clarify and update the tariff provisions)
describing the Company's current process for)
estimating customer gas usage.

Case No. GT-2002-70

**PUBLIC COUNSEL'S REQUEST TO FURTHER
SUSPEND TARIFF AND REQUEST FOR HEARING**

COMES NOW the Office of the Public Counsel ("Public Counsel") and for its request to further suspend tariff and request for hearing states as follows:

1. On September 21, 2001 the Commission issued an Order Directing Staff, Public Counsel and AmerenUE to "file a recommendation regarding approval or further suspension of Tariff Number 200200068, submitted by Union Electric Company d/b/a AmerenUE."

2. Public Counsel has met with UE and Staff and most of its concerns have been alleviated. However, not all of Public Counsel's concerns about the proposed tariff have been resolved. Public Counsel believes that any tariff approved should contain the formula for calculating multi-month estimated bills and an example of how the multi-month estimated bills will be calculated using the formula proposed to be established in the tariff at issue. Providing the formula and an example of how the formula will be utilized will remove any ambiguity from the tariff as to how multi-month estimated bills will be calculated.

3. Public Counsel understands that UE is opposed to including the formula and an example of the calculation in the tariff.

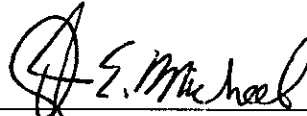
4. Public Counsel requests the Commission suspend the proposed tariff and hold a hearing to determine whether or not the formula for determining multi-month estimated bills and an example of the formula should be contained in the proposed tariff.

WHEREFORE, Public Counsel requests the Commission further suspend Tariff Number 200200068 and set this case for hearing.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY:



Douglas E. Micheel, Esq. (Bar No. 38371)
Senior Public Counsel
P. O. Box 7800, Suite 650
Jefferson City, MO 65102
Telephone : (573) 751-5560
Fax: (573) 751-5562
dmicheel@mail.state.mo.us

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been faxed, mailed or hand-delivered to the following counsel of record on this 24th day of September, 2001:

General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City MO 65102

Ronald Evans
Ameren Services
One Ameren Plaza
P. O. Box 66149 (MC 1300)
St. Louis MO 63166-6149