

**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 Natural Gas Service	)	Case No. GR-2010-0363
Provided to Customers in the Company's	)	
Missouri Service Area.	)	

**AMERENUE'S RESPONSE TO MOTION FOR REHEARING**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), by and through counsel, and in response to the Motion for Rehearing filed on September 10, 2010, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. On July 28, 2010, the Commission issued an order granting MoGas Pipeline LLC's ("MoGas") application to intervene. AmerenUE asked the Commission to reconsider that order by its August 5, 2010 Motion for Reconsideration. On September 1, 2010, the Commission issued its Order Granting Motion for Reconsideration, wherein, after reconsideration, the Commission denied MoGas's application for intervention.

2. On September 10, 2010, MoGas filed its Motion for Rehearing alleging that the Commission's Order Granting Motion for Reconsideration was unlawful, unjust and unreasonable. MoGas further made the unsupported assertion that its intervention "serves the public interest." The Commission should deny the Motion for Rehearing.

3. All Commission intervention is permissive. Commission Rule 240-2.075(4) indicates that the Commission *may* grant an intervention request when: (A) the proposed intervener has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case; or (B) granting the proposed intervention would serve the public interest.

4. The Commission's Order Granting Reconsideration found that "MoGas has failed to show that its interest will be affected by an outcome of this case" and that the "company's participation as a party cannot possibly serve the public interest and, as pointed out by AmerenUE, may be contrary to the public interest."

5. There is nothing found in the Motion for Rehearing to change these findings. MoGas again asserts that it has an interest because it is mentioned in AmerenUE's direct testimony. The mere fact that AmerenUE's rate case testimony mentions MoGas as a natural gas pipeline on which the Company transports natural gas does not establish that MoGas has an interest in this general rate case. Further, even if MoGas were found to have "an interest which is different from that of the general public," MoGas admits that it has stated that "it did not know how its interest may be adversely affected, directly or collaterally, by a final order in this case." Lastly, MoGas offers no affirmative statement as to why its intervention could serve the public interest.

6. The Motion for Rehearing offers nothing that would change the findings made by the Commission in its Order Granting Motion for Reconsideration. Thus, the Motion for Rehearing should be denied.

WHEREFORE, AmerenUE respectfully requests the Commission issue its order denying

the Motion for Rehearing.

Respectfully submitted,



---

Dean Cooper                      MBE #36592  
BRYDON, SWEARENGEN & ENGLAND  
P.C.  
312 E. Capitol Avenue  
P. O. Box 456  
Jefferson City, MO 65102  
Phone: (573) 635-7166  
Fax: (573) 635-3857  
DCooper@brydonlaw.com

Wendy K. Tatro, # 60261  
Associate General Counsel  
Union Electric Company, d/b/a  
AmerenUE  
1901 Chouteau Avenue, MC-1310  
P.O. Box 66149, MC-1310  
St. Louis, Missouri 63166-6149  
(314) 554-3484 (Telephone)  
(314) 554-4014 (Facsimile)  
AmerenUEService@ameren.com

ATTORNEYS FOR AMERENUE

**CERTIFICATE OF SERVICE**

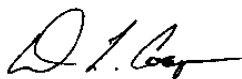
I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 15<sup>th</sup> day of September, 2010, to:

Eric Dearmont/Lera Shemwell  
Missouri Public Service Commission  
Governor's Office Building  
200 Madison Street  
P.O. Box 360  
Jefferson City, Missouri 65102  
[Lera.shemwell@psc.mo.gov](mailto:Lera.shemwell@psc.mo.gov)  
[Eric.dearmont@psc.mo.gov](mailto:Eric.dearmont@psc.mo.gov)

Marc Poston  
Governor's Office Building  
200 Madison Street  
P.O. Box 7800  
Jefferson City, Missouri 65102  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)

Sarah Mangelsdorf  
Shelley A. Woods  
Assistant Attorney General  
P.O. Box 899  
Jefferson City, Missouri 65102  
[sarah.mangelsdorf@ago.mo.gov](mailto:sarah.mangelsdorf@ago.mo.gov)

Leland B. Curtis  
Curtis, Heinz, Garrett & O'Keefe, P.C.  
130 S. Bemiston, Suite 200  
Clayton, Missouri 63105  
[lcurtis@lawfirmemail.com](mailto:lcurtis@lawfirmemail.com)



---