

March 29, 2001

**VIA FEDERAL EXPRESS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 100  
Jefferson City, MO 65101



**FILED<sup>2</sup>**  
MAR 30 2001  
Missouri Public  
Service Commission

Re: In the matter of the Application of Union Electric Company  
(d/b/a AmerenUE) for an order to approve a change to the  
single phase meter testing standard under which AmerenUE  
currently performs its single phase meter testing  
Case No. E0-2001-521

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and eight (8)  
copies of the Application of AmerenUE.

Please kindly acknowledge receipt of this filing by stamping as filed a copy of this  
letter and returning it to the undersigned in the enclosed, self-addressed, stamped  
envelope.

Sincerely,

A handwritten signature in cursive script that reads "David Hennen".

David B. Hennen  
Associate General Counsel

DBH:rd  
enclosures

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

MAR 30 2001

Missouri Public  
Service Commission

In the matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for )  
an order to approve a change to the single phase )  
meter testing standard under which AmerenUE )  
currently performs its single phase meter testing )

Case No. *EO-2001-521*

**APPLICATION OF UNION ELECTRIC COMPANY FOR  
APPROVAL TO CHANGE THE SINGLE PHASE METER  
TESTING STANDARD UNDER WHICH AMERENUE  
CURRENTLY PERFORMS ITS SINGLE PHASE METER TESTING**

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), and hereby requests, pursuant to 4 CSR 240-2.060, approval of the Missouri Public Service Commission ("Commission") of this Application to change the single phase watt-hour meter statistical sample testing standard under which AmerenUE currently performs its single phase meter testing, and in support thereof, respectfully states the following:

1. AmerenUE is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. AmerenUE is engaged in providing electric, gas and steam heating utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). AmerenUE is also engaged in providing electric and gas service in portions of Illinois. There is already on file with the Commission a certified copy of AmerenUE's Restated Articles of Incorporation (see Commission Case No. EA-87-105), and a copy of AmerenUE's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (see Commission Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders and other correspondence concerning this Application should be addressed to:

David B. Hennen  
Associate General Counsel  
Ameren Services Company  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-4673  
Fax: (314) 554-4014  
Dhennen@ameren.com

3. AmerenUE does not have any pending action or unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within the last three (3) years. Furthermore, AmerenUE does not have any annual report or assessment fees that are overdue.

#### **Historical Background**

4. By application filed on August 26, 1974 (hereinafter "Prior Application"), the Company sought permission to depart from certain requirements of Rule 32 of the Commission's General Order No. 20 (hereinafter "Rule 32") regarding the testing of electric service watt-hour meters.

5. Rule 32 required that every electric service watt-hour meter in Missouri be periodically tested by the electric corporation furnishing the same. The schedule of testing a meter was based upon the year that it was manufactured and the rated current capacity of that meter. For example, induction type watt-hour meters not exceeding 50 amperes and manufactured after 1927, but before 1937, needed to be tested every 96 months. Watt-hour

meters manufactured during and since 1937 had to be tested every 240 months. These same testing schedules required under Rule 32 are now codified in 4 CSR 240-10.030(28).

6. In its Prior Application, the Company sought approval to be relieved from full compliance with Rule 32, and in furtherance thereof, submitted to the Commission an alternative testing procedure that differed from the testing requirements set forth under Rule 32.

7. The Company's alternative testing procedure would utilize a standardized statistical sampling technique that incorporates the mathematical principles of Statistical Quality Control as set forth in published standards of the United States Military establishments and other government agencies. (i.e. MIL-STD-414 and MIL-STD-105) (Hereinafter, such standards shall be referred to collectively as "MIL Standards".) The alternative testing procedure would insure with a confidence level of 95% that not more than 2.5% of meters in service will deviate from 100% accuracy of registration by more than plus or minus 2.0%.

8. In its order dated March 12, 1975, the Commission stated in its order approving the Company's request to implement the alternative testing procedure using the MIL Standards sampling technique that the new procedure was in the public interest both from an economic and a practical standpoint. In support of its order the Commission further stated: i) the new testing procedure using the MIL Standards sampling technique would result in significant cost savings of about \$1.5 million over twenty years, ii) by employing the MIL Standards sample testing technique, the Company can focus its testing on those meters that are known to need adjustment or replacement rather than testing each and every meter in operation, most of which will be found to be accurate, iii) testing every meter is time consuming and expensive and if a more feasible method can be used to achieve the same result, then that method should be implemented, iv) the

alternate testing procedure will not impact the procedure in which the Company tests its meters upon the receipt of a customer complaint.

9. The Company, in accordance with the Commission order, has utilized the alternative testing procedure to date as its means of testing the Company's single phase watt-hour meters.

### **Request**

10. Pursuant to 4 CSR -10.030(28), AmerenUE hereby requests the Commission's approval to change from the MIL Standards currently used by AmerenUE as a basis for its testing procedure to the American National Standard Institute Sampling Procedures and Tables for Inspection by Attributes and by Variables. (i.e. ANSI/ASQC Z1.4 and ANSI/ASCQ Z1.9 which are attached hereto as Appendix A and B respectively and incorporated herein for all purposes.) (Hereinafter, such standards shall collectively be referred to as the "ANSI Standards".) In support thereof AmerenUE states the following:

- A. The ANSI Standards are essentially a modernization of the MIL Standards. This is evidenced by the statements contained in the forwards of the respective ANSI Standards. The forward of ANSI/ASQC Z1.4 states that ANSI/ASQC Z1.4 "corresponds directly to MIL-STD-105E... All the tables, table numbers, and procedures used in MIL-STD-105E were retained. The tables are unchanged to make the tabular content completely compatible with MIL-STD-105E." The forward of ANSI/ASQC Z1.9 states that ANSI/ASQC Z1.9 "corresponds directly to the military standard MIL-STD-414... The tables and procedures contained

herein are those of the original MIL-STD-414, suitably modified to ... match MIL-STD-105D."

- B. All other aspects of the Company's testing procedure will remain the same as approved by the Commission in its March 12, 1975 order.
- C. The change from the MIL Standards to the ANSI Standards will not result in any additional cost to the Company's electric customers.
- D. The change from the MIL Standards to the ANSI Standards will not result in a reduction of meters tested nor change the accuracy of the meter testing procedures. The sampling procedures under the ANSI Standards will continue to insure with a confidence level of 95% that not more than 2.5 % of meters in service will deviate from 100% accuracy of registration by more than plus or minus 2.0%.
- E. In connection with the Illinois restructuring legislation, the Company was required to update its electric meter testing procedures in Illinois to incorporate the ANSI Standards. As a result, the Company purchased new software for managing its ANSI Standard based meter testing procedure in Illinois, which also could be used for testing the Company's watt-hour meters in Missouri. Employing the same testing procedure in both of the Company's jurisdictions will reduce the administrative burdens of having to maintain and track two separate, but statistically identical, meter testing programs.
- F. It is the Company's understanding that other electric utilities under the Commission's jurisdiction have been granted permission to use the ANSI

Standards as a basis for their meter testing program.

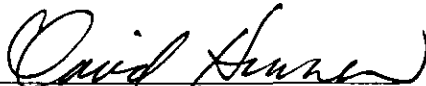
G. In an order dated November 12, 1997 in Case No. GO-98-25, the Commission approved the Company's request to utilize the ANSI Standards as a basis for its natural gas meter testing program.

H. A change from the MIL Standards to the ANSI Standards will not have any impact on the procedure in which the Company tests its meters upon the receipt of a customer complaint.

WHEREFORE, AmerenUE requests that this Commission enter an order granting permission, consent, approval and authority to AmerenUE to adopt the ANSI Standards as a basis for its single phase, watt-hour meter testing procedure.

Respectfully submitted

UNION ELECTRIC COMPANY d/b/a AmerenUE



David B. Hennen

MBE# 0046776

Ameren Services Company

P.O. Box 66149 (MC 1310)

St. Louis, Mo. 63166-6149

(314) 554-4673

(314) 554-4014 - fax

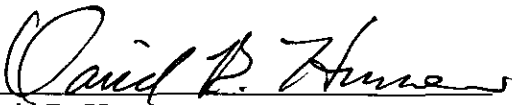
[DHennen@ameren.com](mailto:DHennen@ameren.com)

Dated: March 29, 2001

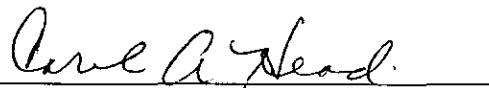
VERIFICATION

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

I, David B. Hennen, do state upon oath, that I am an attorney for Union Electric Company, d/b/a AmerenUE, with authority to file this Application, that I am familiar with its contents, and that they are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
David B. Hennen

Sworn to before me this 29<sup>th</sup> day of March, 2001.

  
\_\_\_\_\_  
Notary Public

CAROL A. HEAD  
Notary Public - Notary Seal  
STATE OF MISSOURI  
St. Charles County  
My Commission Expires: Sept. 23, 2002

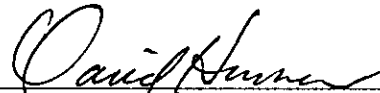


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application was mailed by U. S. mail, first class, postage paid to the following persons on this 29<sup>th</sup> day of March, 2001:

General Counsel  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 100  
Jefferson City, Missouri 65101

Office of Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
Jefferson City, Missouri 65101



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David B. Hennen