

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

In the Matter of the Application to Intervene)	
In Union Electric Company d/b/a)	Case No. GT-2005-0069
AmerenUE Proposed Tariffs filed under)	Tariff No. JG-2005-0145
Tariff No. JG-2005-0145)	

RESPONSE TO APPLICATIONS FOR REHEARING

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company) and hereby responds to the Applications for Rehearing filed by MFA Incorporated (MFA) and Oneok Energy Marketing Company (Oneok), and Seminole Energy Services, L.L.C. (Seminole). In support thereof, AmerenUE states as follows:

1. On August 31, 2004, AmerenUE filed proposed tariffs in this proceeding to a) clarify that its existing balancing provisions supply to all customers that do not have balancing performed by their transportation pipeline and b) offer a group balancing service which would enable AmerenUE's transportation customers to balance their gas usage as a group.

2. MFA, Oneok and Seminole intervened in this proceeding and sought rejection of the proposed tariff on a variety of grounds. Specifically, these parties argued that Panhandle Eastern Pipe Line Company's (PEPL) decision to limit the availability of "burner tip balancing" could result in discrimination to them, and the pre-existing balancing provisions of AmerenUE's tariff are less favorable than the PEPL balancing provisions that had previously been applicable to them.

3. Following oral argument, the Commission issued its Order Approving Tariff, permitting the tariffs to take effect on October 29, 2004. MFA, Oneok and Seminole have now


submitted applications for rehearing, essentially rehashing the arguments that have been rejected by the Commission.

4. The applications for rehearing have presented no compelling arguments for the Commission to reverse its decision to approve these tariffs. AmerenUE's pre-existing tariff provisions are simply not at issue in this case, and the applicants have provided no persuasive reason for the Commission to disapprove AmerenUE's group balancing provisions, which provide a valuable tool that AmerenUE's transportation customers (including those who did not intervene in this proceeding) can use to stay in balance.

WHEREFORE, AmerenUE respectfully requests that the Commission deny the Applications for Rehearing.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

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Dated: November 16, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 16th day of November, 2004, served the foregoing Response in Opposition to Motion to Suspend by electronic means to all parties by their attorneys of record as provided by the Secretary of the Commission as shown below.

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