

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 635-3847

E-MAIL: DCOOPER@BRYDONLAW.COM

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

DEAN L. COOPER
MARK G. ANDERSON
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
DIANA C. FARR
JANET E. WHEELER

OF COUNSEL
RICHARD T. CIOTTONE

July 7, 2003

Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GR-2003-0517

FILED²
JUL 07 2003
Missouri Public
Service Commission

Dear Mr. Roberts:

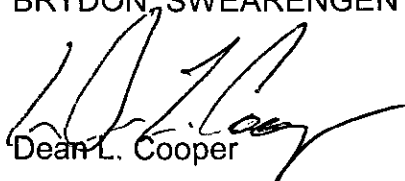
Enclosed please find an original and eight copies of a Reply Concerning Motion to Modify Customer Notice filed on behalf of AmerenUE. Please file stamp the enclosed extra receipt copy and return to me for my records.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/tli

Enclosures

cc: General Counsel's Office
Office of the Public Counsel
Shelly A. Woods
Thomas Byrne

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

FILED²

JUL 07 2003

**Missouri Public
Service Commission**

In the Matter of Union Electric Company,)
d/b/a AmerenUE, for Authority to File)
Tariffs Increasing Rates for Gas Service)
Provided to Customers in the Company's)
Missouri Service Area.)

Case No. GR-2003-0517

**REPLY CONCERNING
MOTION TO MODIFY CUSTOMER NOTICE**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or the "Company") and, as its reply concerning the Public Counsel's Motion to Modify Customer Notice, states as follows to the Missouri Public Service Commission ("Commission"):

1. On June 16, 2003, the Office of the Public Counsel ("Public Counsel") filed its Motion to Modify Customer Notice (the "Motion"). In the Motion, the Public Counsel asked that the Commission modify its Suspension Order and Notice to require that the hearing notices provided by AmerenUE to its customers include the proposed percentage increase related to the non-gas portion of AmerenUE's bill, the proposed percentage increase related to the total bill and an explanation of non-gas and gas related costs.

2. On June 23, 2003, AmerenUE responded in opposition to the Public Counsel's Motion. Commission Staff responded on June 24, supporting Public Counsel's Motion. Public Counsel replied on June 24. The Commission then issued its Order Directing Filing wherein it allowed the Commission Staff and AmerenUE until July 5, 2003 to respond to the Public Counsel's Reply to Union Electric's Response in Opposition to Public Counsel's Motion to Modify Customer Notice.

3. AmerenUE continues to believe that providing relevant and useful information to the

customers concerning the impact of a proposed rate increase on their utility bills in an easily readable format should be the goal of the notice requirement. The Public Counsel's proposed notice, which the Public Counsel agrees "is a departure from past practice" (OPC Reply, p. 4), provides more information, but it is not more information that will help the customers understand how their utility bills will be affected by the proposed increase. In fact, without a close reading, Public Counsel's proposed language would suggest that a 78% increase to the customer's bill has been proposed, which is obviously not the case.¹ The Commission's consistent historic practice of issuing notices which focus on the impact on customers' bills without subdividing them into their component parts is designed to avoid such possible confusion. The Commission should reject Public Counsel's invitation to depart from past practice and not utilize the more confusing form of notice proposed by the Public Counsel.

4. It is important to point out that the Commission's traditional form of notice does not deprive customers of the opportunity to find out additional information about a utility's rate filing. For the most part, rate cases are developed through publicly available documents. Public Counsel is free to cite the proposed 78% increase in the delivery charge component of AmerenUE's rates in public testimony, public pleadings and public statements. But in the official notice of the proposed rate increase, which should be limited to only a few sentences, the Commission should continue its practice of directly and succinctly describing the impact on the customer's bill.

5. This having been said, AmerenUE does agree with the Public Counsel that the original notice ordered by the Commission could be improved if it provided bill impacts specific to

¹ At a bare minimum, if the Commission rules in favor of the Public Counsel on this issue, the 78% figure should be included after the description of the overall rate increase.

each customer class. The 17.8% figure utilized in the notice is the overall percentage increase requested by the Company in this case, not the increase applicable to any particular customer class. In light of this fact, AmerenUE suggests that the Commission's original notice be modified as follows:

Union Electric Company, d/b/a AmerenUE has filed revised natural gas service tariff sheets with the Missouri Public Service Commission (PSC) which would increase the company's Missouri jurisdictional annual gross revenues by approximately 17.8 percent. The proposal would result in the following approximate monthly increases for the average customers in each rate class:

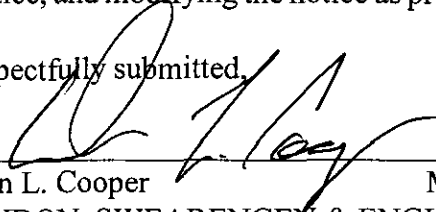
Residential (using natural gas for heating)	\$ 16.26	24.9%
General Service Customers	\$ 42.75	16.7%
Interruptible Service Customers	\$845.00	4.3%
Transportation Service Customers	\$610.50	3.5%

6. This approach would utilize the simplicity and directness of the notice historically used by the Commission, while still providing each class of customer with information that is specifically relevant to its resulting bill. The Commission's notices should continue to emphasize bill impacts, not describe a proposed rate increase as it relates to only one portion of the customer's natural gas bill.

WHEREFORE, AmerenUE respectfully requests the Commission issue its order denying

Public Counsel's Motion to Modify Customer Notice, and modifying the notice as proposed herein.

Respectfully submitted,



Dean L. Cooper MBE#36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
573/635-7166 (phone)
573/635-0427 (facsimile)
dcooper@brydonlaw.com

Thomas M. Byrne MBE#33340
Associate General Counsel
Union Electric Company d/b/a AmerenUE
1901 Chouteau Avenue
P.O. Box 66149, MC-1310
St. Louis, Missouri 63101-6149
(314) 554-2514 (telephone)
(314) 554-4014 (facsimile)
tbyrne@ameren.com

ATTORNEYS FOR UNION ELECTRIC COMPANY
D/B/A AMERENUE

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 7th day of July, 2003, to the following:

Ms. Lera Shemwell
Missouri Public Service Commission
Governor State Office Building, 8th Floor
Jefferson City, MO 65101

Mr. Doug Micheel
Office of the Public Counsel
Governor State Office Building, 6th Floor
Jefferson City, MO 65101

Ms. Shelley A. Woods
Assistant Attorney General
P.O. Box 899
Jefferson City, MO 65102

