

FILED

April 13, 2000

APR 14 2000

Missouri Public
Service Commission

Mr. Brian Kincaid, Executive Director
Missouri Public Service Commission
Jefferson City, MO 65102

Dear Mr. Kincaid:

EE- 2000 - 647

We are enclosing one copy each of Annual Reports of Union Electric Company for the year ended December 31, 1999 for its gas and steam utility operations.

Additionally, we are enclosing two copies of the electric report – (1) a copy including all required pages labeled “Contains Privileged Information – Do Not Release” and (2) a copy with the pertinent pages removed for which we are seeking the confidential treatment. Please also find one original and fourteen (14) copies of the “Request of Union Electric Company for Confidential Treatment of Certain Data Contained in FERC Form No. 1” referencing our confidentiality request.

Comments regarding our request for confidentiality should be addressed to William J. Niehoff, Esq. at Ameren Services Company, 1901 Chouteau Avenue, Mail Code 1310, St. Louis, MO 63103.

Sincerely,



G. L. Waters
Assistant Secretary

GLW:kab
Enclosures

cc: Office of the Public Counsel
Truman Building
301 West High Street Room 250
Jefferson City, MO 65101



STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

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Application of Union Electric)
Company For Confidential Treatment)
of Certain Reports Filed)
with the Missouri Public Service)
Commission)

Missouri Public
Service Commission

Docket No. EE-2000-647

**REQUEST OF UNION ELECTRIC COMPANY
FOR CONFIDENTIAL TREATMENT OF CERTAIN DATA
CONTAINED IN FERC FORM NO. 1: ANNUAL REPORT OF MAJOR ELECTRIC
UTILITIES, LICENSEES, AND OTHERS**

COMES NOW Union Electric Company (d/b/a AmerenUE), pursuant to 4 CSR 240-10.080 (7), and requests the Missouri Public Service Commission ("Commission") to enter a protective order covering the attached reports and holding the same as confidential, and in support thereof, states:

1. AmerenUE is a public utility subject to the jurisdiction of the Missouri Public Service Commission.
2. Pursuant to section 393.140 RSMo, the Commission requires AmerenUE to file its Annual Report and therein report statistics and information listing highly confidential and proprietary information regarding its generation assets.
3. Section 4 CSR 240-10.080 (7), which governs filing of the Annual Report, states:
 - (7) Where a utility subject to this rule considers the information requested on the annual report form to be confidential, it must make a written request to the executive secretary to file that information under seal and state good cause for maintaining the information under seal. The executive secretary shall then, through the general counsel, present that request to the commission for approval. The executive secretary shall inform the utility within three (3) days of the commission decision whether the request has been granted.

4. The Commission has previously granted requests for confidential treatment of information set forth in the Annual Report. See, In the Matter of the Application of Laclede Gas Company to Close Certain Information Presented in its 1997 Annual Report, Case No. GO-98-461 (1998). In the Laclede case, the Commission stated:

Pursuant to Sections 392.210 and 393.140, the Commission requires public utilities to file certain information with the Commission in the form of an annual report. The requirements are implemented by an order of the Commission adopting 4 CSR 240-10.080. Under this rule the Commission treats annual report information as an open public record. However utilities subject to this rule may make written application for the closure of annual report information where a utility considers information requested to be confidential and states good cause (the need or basis) to maintain the information as confidential. Where such an application is made and the information is not otherwise required to be open by law, the Commission may approve the application.

(Id., p. 1).

5. AmerenUE previously made a similar request for confidential treatment with regard to the 1998 Annual Report. See, Application of Union Electric Company for Confidential Treatment of Certain Reports filed with the Missouri Public Service Commission, Case No. EO-99-470. AmerenUE withdrew its request after the Federal Energy Regulatory Commission (FERC) denied confidential treatment for the same information as is filed with the Missouri Commission.

6. AmerenUE intends to file for confidential treatment with the FERC for its 1999 Form 1 Report. This request will be filed on or before the date the Form 1 is due to be filed on May 1, 2000. Should FERC deny confidential treatment of the information contained in the Form 1, AmerenUE would withdraw or modify this request to the same extent.

7. The attached Exhibit A references the Schedules for which AmerenUE are requesting confidential treatment along with the reasons why this data should be so considered.

8. As is clear from reference to Exhibit A, such reports contain highly sensitive

confidential and proprietary information which if made available to the public would harm AmerenUE in the conduct of its business and provide unfair advantage to its competitors.

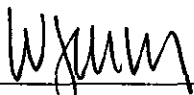
9. AmerenUE has or will requested that similar reports filed with the Federal Energy Regulatory Commission and with the Illinois Commerce Commission be maintained on a confidential basis.

10. AmerenUE is enclosing herewith copies of its Annual Report marked "confidential" and also non-confidential versions of the same report.

WHEREFORE, AmerenUE respectfully requests the Commission to enter its order granting confidential treatment to those portions of the Annual Report identified herein.

Respectfully submitted,

UNION ELECTRIC COMPANY



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(314) 554-2514
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Listing of FERC Form 1 Schedules for which Union Electric Company is seeking privileged and confidential treatment

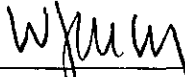
Page	Title	Sensitive Data Contained
202-203	Nuclear Fuel Materials	Nuclear fuel cost data allows competitors to determine the Company's cost for this type of fuel. They can also determine the volume of nuclear fuel stock of the Company.
204-207	Electric Plant in Service	Details of the magnitude of plant and equipment owned by the Company as well as volume of capital additions during the year. The Company has only one nuclear plant leaving information regarding this plant especially exposed.
216	CWIP – Electric	Strategic planning information re: new capital investments. Outside parties can determine which areas the Company is focusing on.
219	Accumulated Provision for Depreciation of Electric Utility Plant	The Company has only one nuclear plant leaving information regarding the net book value of this plant especially exposed.
228-229	Allowances	Emission allowance inventory and activity levels allow others to know our status and strategy. Contracts between buyers and sellers are confidential.
304	Sales of Electricity by Rate Schedules	Specifics of mwh sold, revenue derived, average number of customers, kwh per customer, and revenue per kwh by rate schedule. Making this type of detailed information public puts reporting companies at a disadvantage with companies not required to disclose this information.
310-311	Sales of Resale	Competitive information such as customer names and revenue disclosed to outside

		parties. Allows competitors to develop marketing strategies to invade the Company's markets by knowing buyers' names. Since not all electricity providers have to report this information, the Company is put at a competitive disadvantage in the wholesale electric market.
320-323	Electric O&M Expenses	Detailed operations and maintenance costs by function, especially production, allow competitors to determine the efficiency of the Company's activities. It can also be used against the Company in the event of a hostile takeover attempt or in an organized labor movement situation.
326-327	Purchased Power	Sensitive contract and pricing information shows competitors how much the Company is paying for power purchases – effects negotiating abilities on future purchases. This data can be used by competitors to gain a competitive advantage, especially those not required to make this information public.
328-330	Transmission of Electricity for Others	Very detailed data by customer and rate indicating the provider, receiver, revenue, etc. Competitors can use this information, along with costs of purchased power, to determine delivered costs.
332	Transmission of Electricity by Others	Cost information by provider impacts future negotiating abilities. Competitors can use this information, along with costs of purchased power, to determine delivered costs.
352-353	Research & Development	Shows where the Company is focusing development efforts; future technological direction of the Company. Could be used against the Company by others in situations requiring expertise and investment in new areas.

354-355	Distribution of Salaries & Wages	Details of labor costs by function reveal sensitive data to our competitors. Average salaries of the Company's work force can be calculated. Disclosing this data puts the Company at a disadvantage to those not required to report this information. It can also be used against the Company in the event of a hostile takeover attempt or in an organized labor movement situation.
401	Electric Energy Account / Monthly Peaks & Output	Sources and disposition of energy as well as monthly operating data regarding energy and peaks allows competitors to determine operation cycles and volumes.
402-411	Generating Plant Statistics	Extremely sensitive operating cost data by each individual plant. Fuel and other costs provide competitors with a clear picture of operations and efficiencies. Disclosure of plant details puts the Company at a disadvantage in the event of a hostile takeover attempt.
431	Environmental Protection Expenses	Displays amount spent on pollution control efforts. Discloses fuel-related costs, in particular, the cost of environmentally clean fuels and replacement power costs.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served to the parties of record via first class U.S. mail on this 13th day of April, 2000.



William J. Niehoff

VERIFICATION

William J. Niehoff, first duly sworn that he is an attorney representing the above companies, that he is authorized to submit this Application, and that the facts stated therein are true and correct to the best of his knowledge, information and belief.

William J. Niehoff
William J. Niehoff

Subscribed and sworn to before me this 13th day of April, 2000.

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