



Missouri Public Service Commission

Commissioners

WILLIAM D. STEINBERG,
Chairman
ALLAN G. MUELLER
DAVID L. BAUGH
KENNETH McCLEURE
RUBY L. LETSCH-RODERIQUE

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
314 751-3234
314 751-1047 (Fax Number)

ROBERT J. SCRIBNER,
Staff Director
GORDON L. PERSINGER,
Director, Utility Division
MARY ANN YOUNG,
General Counsel
C. GENE FEE,
Chief Hearing Examiner
HARVEY G. HUBBS,
Secretary

March 26, 1991

Mr. Brent Stewart
Executive Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: **Case No. EO-91-251 - In the Matter of the Application of Union Electric Company for variance from Promotional Practices Rule for good cause shown and for approval of Promotional Practices Sheets.**

Dear Mr. Stewart:

Enclosed for filing in the above-captioned case is an original and fourteen (14) conformed copies of **STAFF'S REQUEST FOR HEARING.**

A copy of same has been mailed or hand delivered this date to all parties of record.

Respectfully submitted,

Robert J. Hack
Assistant General Counsel
(314) 751-8705

RJH:bss
Enclosure
cc: All Parties of Record

FILED

MAR 26 1991

PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Application)
of Union Electric Company for)
variance from Promotional)
Practices Rule for good cause) EO-91-251
shown and for approval of)
Promotional Practices Sheets.)

REQUEST FOR HEARING

Comes now the Staff of the Missouri Public Service Commission (Staff), and for its Request for Hearing respectfully states as follows:

1. On January 14, 1991, Union Electric Company (UE) filed its application for a variance from the Commission Promotional Practices Rule seeking authority to implement a "satisfaction guarantee" promotion with the stated purpose of increasing the number of heat pump sales in UE's service territory.

2. UE alleges that it has demonstrated good cause sufficient for the Commission to grant the variance on an expedited basis without a hearing. The Staff disagrees.

3. UE's application is conspicuously silent in terms of the impact this proposed incentive may have on regulated alternative fuel suppliers operating in UE's service area. Whether and to what extent an electric utility's proposed incentive will impact a competing natural gas utility, or vice versa, is a primary consideration this Commission must weigh

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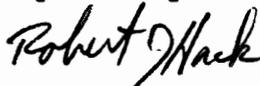
PUBLIC SERVICE COMMISSION

before it authorizes the offering of otherwise prohibited promotions. The Commission does not have the luxury of viewing such issues in a vacuum world of electricity only, as does UE's application, but instead must take a broader perspective which encompasses the interests of the public generally, including Laclede Gas Company and its customers.

4. The Staff would also emphasize that the fact that UE's proposed "satisfaction guarantee" promotion is of extremely limited scope, duration and budget should not diminish the scrutiny to which UE's application is put. Good cause must be shown whether a utility wants to give away \$7,500 or \$75,000,000.

WHEREFORE, the Staff respectfully requests that the Commission issue its order which sets this matter for hearing and directs the establishment of a procedural schedule to meet that end.

Respectfully submitted,



Robert J. Hack
Assistant General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102
(314) 751-8705

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all parties of record this 26th day of March, 1991.