

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

In the Matter of an Investigation of)	
Union Electric Company, d/b/a)	Case No. EO-2008-0218
AmerenUE's Storm Preparation and)	
Restoration Efforts)	

STAFF'S SUPPLEMENTAL REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and submits this Supplemental Report evaluating Union Electric Company, d/b/a AmerenUE's (AmerenUE or Company) November 10, 2008 Status Update to Staff Recommendations Regarding Storm Preparation and Restoration Efforts. For its Supplemental Report, the Staff respectfully states to the Missouri Public Service Commission (Commission) as follows:

1. On January 2, 2008, the Commission issued an order directing Staff to investigate AmerenUE's response to the December 2007 ice storm experienced in its service territory. On April 3, 2008, Staff filed an initial report of its investigation with the Commission, followed by a final report submitted on June 17, 2008.
2. Staff's June 17, 2008 Final Report contained eight (8) recommendations on how AmerenUE could improve its response in future storms. AmerenUE filed a response to Staff's recommendations on August 15, 2008.
3. On September 9, 2008, the Commission issued an order directing "AmerenUE to provide Staff with additional information regarding its progress in complying with Staff's recommendations." The Commission further ordered Staff to file a brief supplemental report evaluating the Company's compliance with Staff's recommendations.
4. Attached hereto is Staff's Memorandum, completed by Dan Beck, Utility Regulatory Engineering Supervisor, and Debbie Bernsen, Utility Management Analyst.

5. Staff's Memorandum contains specific discussion on certain recommendations, along with the overall conclusion that AmerenUE has achieved compliance with all but one of Staff's June 17, 2008 recommendations, or is taking appropriate action to do so.
6. Staff also reviewed company actions toward thirty-seven (37) recommendations made in a November 2007 KEMA report. Staff has concluded that AmerenUE has evaluated or taken action upon the KEMA recommendations.
7. Staff will continue to monitor AmerenUE's actions toward completion of Staff's and KEMA's recommendations.

WHEREFORE, the Staff submits its Supplemental Report to the Missouri Public Service Commission.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

Legal Counsel

Missouri Bar No. 59814

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was served via U.S. Mail, electronic mail, or facsimile upon all counsel of record this 9th day of January, 2009.

/s/ Jennifer Hernandez

Memorandum

TO: Missouri Public Service Commission Official Case File
Case No. EO-2008-0218, Investigation of AmerenUE Company's Storm
Preparation and Restoration Efforts

FROM Debbie Bernsen, Engineering and Management Services Department
Dan Beck, Energy Department-Engineering Analysis

/s/ Lena Mantle 1/9/09
Energy Department / Date

/s/ Jennifer Hernandez 1/9/09
General Counsel's Office / Date

Subject: Staff Supplemental Report

Date: January 9, 2009

The Staff of the Missouri Public Service Commission (Staff) has evaluated AmerenUE Company's (AmerenUE's or Company's) Status Update to Staff Recommendations Regarding Storm Preparation and Restoration Efforts. The Status Update was submitted on November 10, 2008 to comply with a Commission Order issued September 9, 2008. The Order also directed that Staff file a supplemental report briefly describing the Company's compliance or explain its non-compliance no later than January 9, 2009.

The Final Report of the Staff's Investigation included eight (8) recommendations. Based on the Staff's evaluation of the information provided to date regarding the Company's compliance with the Staff recommendations contained in the report, the following determinations resulted:

1. AmerenUE has agreed with the substance of all but one of the recommendations made by Staff, and has initiated or completed actions to implement appropriate changes to its procedures, processes, and policies.
2. Approximately three quarters of AmerenUE's actions are completed or scheduled for ongoing review after every major storm. Two items remain to be addressed. Of these two, one item pertains to the development of a Company community outreach function that, together with city and county agencies, would assist customers that have special needs during an outage. This outreach function will require further discussion between the Staff and AmerenUE in order to provide clarification of specific actions that may be taken, and the Staff expects that these discussions will take place in the next few months.
3. The other remaining item, the participation in a storm restoration workshop, will be completed once such a workshop is scheduled. AmerenUE has made a commitment to participate in the workshop.

Staff determined that, from an overall perspective, AmerenUE has achieved compliance with all but one of Staff's recommendations or is taking appropriate action to do so.

In addition to the recommendations made by Staff in the Storm Preparation and Restoration Efforts Report, the Company also had earlier received 37 opportunities for improvement in the KEMA Report released in November of 2007. The Company provided an update on the implementation status of these recommendations. The Company appears to also have evaluated or is taking action upon the 37 opportunities for improvement presented in the KEMA report.

To ensure that the KEMA recommendations are evaluated and implemented if determined to be appropriate, Staff will continue to monitor progress of completion of the Company's actions and may conduct document reviews and other on-site actions to verify the Company's stated actions.

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Electric Company d/b/a AmerenUE's Storm)
Preparation and Restoration Efforts)
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Case No. EO-2008-0218

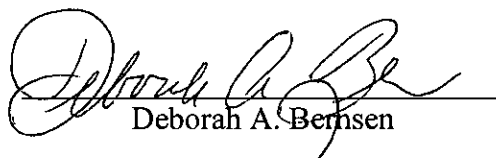
AFFIDAVIT OF DEBORAH A. BERNSEN

STATE OF MISSOURI)

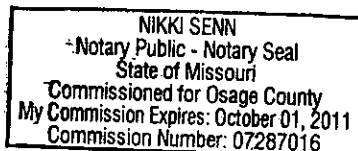
ss.

COUNTY OF COLE)

Deborah A. Bernsen, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed by her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of her knowledge and belief.


Deborah A. Bernsen

Subscribed and sworn to before me this 8th day of January, 2009.




Nikki Senn
Notary Public