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May 1, 2000

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Director, Utility Services

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Secretary/Chief Regulatory Law Judge

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General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: GR-2000-512

FILED²

MAY 01 2000

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF RECOMMENDATION FOR TEST YEAR**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Robert V. Franson
Assistant General Counsel
(573) 751-6651
(573) 751-9285 (Fax)

RVF/jb
Enclosure
cc: Counsel of Record

FILED²

MAY 01 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, D/B/A)
AMERENUE, For Authority to File Tariffs) Case No. GR-2000-512
Increasing Rates for Gas Service Provided to)
Customers in the Company's Missouri Service)
Area)

STAFF'S RECOMMENDATION FOR TEST YEAR

COMES NOW the Staff of the Public Service Commission of the State of Missouri ("Staff") and for its recommendation of the proper test year to be adopted in this proceedings respectfully states as follows:

1. The Suspension Order and Notice issued by the Public Service Commission ("Commission") on March 3, 2000, directed Union Electric Company d/b/a AmerenUE, ("Company") to state its proposed test year recommendation at the same time that it filed its direct testimony.

2. On March 31, 2000, the Company filed its Test Year Recommendation with a recommended test year consisting of the 12 months ending June 30, 1999, and that such test year be updated with known and measurable changes through April 30, 2000. The Company explained in its test year and update filing that the June 30, 1999, test year was proposed because at the time the filing was being prepared it represent the most current complete heating season for which accounting data and consistent and consecutive customer base, revenues and billing units were available.

3. The Suspension Order and Notice directed Staff and other parties to either concur in the Company test recommendation or recommend alternatives at the same time

that these parties filed their direct testimony. The Commission's Order Adopting Procedural Schedule, issued on March 31, 2000, changed this date to May 1, 2000.

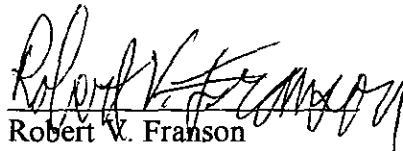
4. Staff concurs in the recommendation of the Company for a test year ending June 30, 1999. The Staff also concurs in the proposal that the test year to be updated with known and measurable changes through April 30, 2000. In addition, the Staff believes the use of these dates will simplify the reconciliation process.

5. Since its direct testimony is not due until August 8 and 15, 2000, Staff will have the opportunity to thoroughly audit changes occurring within the update period. In its Direct Testimony Staff will address the propriety of a true-up audit to address any changes subsequent to April 30, 2000.

WHEREFORE, Staff respectfully requests that the Commission issue its Order establishing a test year of the 12 months ending June 30, 1999, ad updated through April 30, 2000.

Respectfully submitted,

DANA K. JOYCE,
General Counsel



Robert V. Franson
Assistant General Counsel
Missouri Bar No. 34643

Attorney for the Staff of the
Missouri Public Service Commission
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of May, 2000.

A handwritten signature in black ink, appearing to read "Robert V. Finnegan", written over a horizontal line.

**Service List for
Case No. GR-2000-512
May 1, 2000**

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