



Commissioners
KELVIN L. SIMMONS
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CONNIE MURRAY
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Missouri Public Service Commission

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September 24, 2001

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLILIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

FILED²

SEP 24 2001

Missouri Public
Service Commission

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

RE: Case No. GT-2002-70-In the Matter of the Tariff Filing of Union Electric Company d/b/a AmerenUE to Incorporate into the Company's Tariff a Revised Procedure for the Development of Estimated Customer Natural Gas Usage and Clarify and Update the Tariff Provisions Describing the Company's Current Process for Estimating Customer Gas Usage.

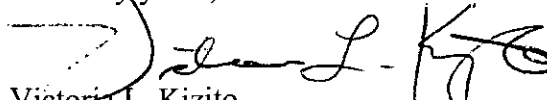
Dear Mr. Roberts:

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

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,


Victoria L. Kizito
(573) 751-6726 (Telephone)
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

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

FILED²

SEP 24 2001

Missouri Public
Service Commission

In the Matter of the Tariff Filing of Union)
Electric Company d/b/a AmerenUE to)
incorporate into the Company's Tariff a)
Revised Procedure for the Development of)
Estimated Customer Natural Gas Usage)
and Clarify and Update the Tariff)
Provisions Describing the Company's)
Current Process for Estimating Customer)
Gas Usage.)

Case No. GT-2002-70

Tariff No. 200200068

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and in response to the Office of the Public Counsel's Motion to Suspend states:

1. On or about July 27, 2001, AmerenUE filed its proposed tariff sheets, its First Revised Sheet No. 56 and 4th Revised Sheet No. 57, regarding the treatment of estimated billings for AmerenUE's customers. The proposed tariff sheets have a date of issue of July 30, 2001 and a proposed effective date of August 29, 2001.

2. Upon motion of the Office of the Public Counsel (OPC), the effective date of AmerenUE's proposed tariff sheets was suspended until September 28, 2001.


3. On September 21, 2001, the Commission filed an Order Directing Staff, Public Counsel, and AmerenUE to File A Recommendation by September 24, 2001.

3. Thomas M. Byrne, Counsel for AmerenUE, has reviewed the Staff's recommendation, and joins in Staff's recommendation.

WHEREFORE, Staff requests that the Commission further suspend the above-referenced tariff sheets until November 1, 2001, so that AmerenUE may withdraw its tariff sheets that were filed July 27, 2001, and file its revised tariff sheets, in accordance with the attached tariff sheets.

Respectfully submitted,

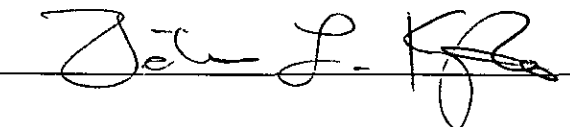
DANA K. JOYCE
General Counsel


Victoria L. Kizito
Associate General Counsel
Missouri Bar No. 46244

Attorney for the Staff of the
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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 24th day of September, 2001.



M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File,
Case No. GT-2002-70, Union Electric Company d/b/a AmerenUE

FROM: ^{DB WW} Daniel I. Beck, Energy Department - Engineering Analysis zk

Wm T. Ward 9-24-01

John J. Howell 9-24-01

Energy Department/Date

General Counsel's Office/Date

SUBJECT: Staff Recommendation Regarding Modifications to AmerenUE's
Estimating Procedures Tariff, Tariff No. 200200068

DATE: September 24, 2001

On July 27, 2001, Union Electric Company d/b/a AmerenUE (AmerenUE or Company) filed two tariff sheets to modify it's estimating procedures. This filing was subsequently suspended for thirty days, until September 28, 2001 to permit the parties to negotiate and come to an agreement regarding the revised tariff provisions. Although total agreement has not been reached by all of the parties, agreement for a significant amount of the tariff language has been achieved between the parties. The revised tariff language can be seen in the specimen tariff sheets which are attached. Since the revisions are significant, Staff maintains that Ameren should withdraw the previous filing and file the revised tariff sheets with an effective date that is 30 or more days from the date of the filing.

Although it is Staff's understanding that all of the parties find the language in this specimen tariffs to be acceptable, it is also Staff's understanding that language in addition to the specimen tariffs is being proposed by The Office of the Public Counsel. Staff maintains that the proposed tariff sheets filed on July 27, 2001 should be suspended until November 1, 2001 to allow AmerenUE to file revised tariffs. This period of approximately one month from will also allow other parties to suggest additional language and allow for additional negotiations.

Based on the discussion above, Staff recommends that the Commission suspend the following tariff sheets until November 1, 2001:

P.S.C. MO. No. 2

First Revised SHEET No. 56 Cancelling Original SHEET No. 56
4th Revised SHEET No. 57 Cancelling 3rd Revised SHEET No. 57

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

VIII. Billing Practices

A. Monthly Billing Periods

Company will render bills over twelve (12) monthly billing periods in a year, with each bill based upon the service used between regularly scheduled meter readings. While Company's work schedules provide for the orderly reading of all meters over intervals of approximately 30 days, holidays, weekends, inclement weather and other operating constraints may cause the billing interval to vary during various portions of the year.

B. Inaccessible Meters

Where a meter is inaccessible to the meter reader during scheduled working hours on repeated occasions, such that a customer must arrange for meter reading by appointment to avoid discontinuance of service, the customer may at his own expense have Company relocate the meter to an accessible location, if feasible.

*C. Estimated Bills for Full Billing Periods

Monthly bills may be rendered to the Company's natural gas customers based upon estimated gas usage (which may include the use of readings furnished by the customer), where conditions reasonably beyond the control of the Company prevented it from obtaining actual meter readings. These conditions include extreme weather, operating and other emergencies, labor agreements, work stoppages, and the Company's inability to gain access to the meter. The Company will provide a copy of customer's estimate, upon request. All estimates are subject to the provisions of Section VII.G. Billing Adjustments, of these Rules and Regulations, and will be determined as follows:

a. Single-Month Estimated Bills

A single billing month's estimated natural gas usage will be determined on the basis of the customer's prior month's usage, adjusted by a factor reflecting the difference in weather between the prior and current monthly billing periods. This adjustment factor will be based upon the ratio of the current month to the prior month's natural gas usage of similarly situated customers for which the Company has obtained actual meter readings. For purposes of this application,

* Indicates Change

DATE OF ISSUE _____

DATE EFFECTIVE _____

ISSUED BY _____

C. W. Mueller
Name of OfficerPresident & CEO
TitleSt. Louis, Missouri
Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

similarly situated customers are those customers within the same rate class, located within the same weather reporting area (e.g., Columbia or Cape Girardeau, MO airport recording stations) and that have meter reading dates approximately the same as the customer whose bill is being estimated.

***b. Multiple-Month Estimated Bills**

When it is necessary to estimate any customer's natural gas usage for periods of two or more billing months, such estimated usage will be developed by an analysis of the gas usage at the customer's premises from prior periods, the number of days in the prior and current billing periods, and the current and historic weather data from the reporting station within which the customer's premises is located. The analysis will include a determination of the customer's heating sensitive and non-heating sensitive (base) usage.

***c. Other Bill Estimation Methods**

Where the aforementioned methods of estimating natural gas usage cannot be utilized or may not be appropriate for either residential or non-residential customers, other reasonable methods may be employed to estimate the gas usage at the customer's premises. These methods may utilize the metered gas usage at the premises from earlier months, customer supplied meter readings, comparable customer gas usage, or other available gas consumption information.

***d. Billing Estimates for Re-Billing Purposes**

In instances associated with a non-registering meter, the Company shall estimate the customer's monthly gas usage in accordance with the provisions of paragraphs (a)-(c) of this Section C, as applicable, for purposes of rebilling the customer.

D. Estimated Initial and Final Bills

The Company will normally be granted access to customer's premises for purposes of obtaining initial and final meter readings and the associated connection and disconnection of gas service. However, where such access cannot be obtained, or other conditions beyond the control of Company prevent obtaining an actual meter reading, estimated initial and final bills may be rendered by Company. When obtained, meter readings will be adjusted to customer's service responsibility

* Indicates Change

DATE OF ISSUE _____

DATE EFFECTIVE _____

ISSUED BY _____

C. W. Mueller
Name of Officer

President & CEO
Title

St. Louis, Missouri
Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

date. However, customer will be responsible for all gas utilized until access is provided to Company for obtaining actual meter readings and the disconnection of gas service. No final bill will be rendered where the amount of the bill for gas usage is less than \$1.00, except for those accounts where a customer deposit is being refunded to customer.

E. Budget Billing Plan

Customers who are billed under the Residential Service Classification or General Service Classification with postcard billing and, at the Company's option, certain eleemosynary customers may elect to be billed and pay for all service under Company's Budget Billing Plan provided customer shall have satisfied Company's credit requirements. The provisions of the Budget Billing Plan are as follows:

DATE OF ISSUE _____

DATE EFFECTIVE _____

ISSUED BY William E. Cornelius

Name of Officer

Chairman

Title

St. Louis, Missouri

Address

Service List for
Case No. GT-2002-70
Verified: August 21, 2001 (cgo)

Ronald Evans
Ameren Services
One Ameren Plaza
PO Box 66149 (MC 1300)
St. Louis, MO 63166-6149

Office of the Public Counsel
P. O. Box 7800
Jefferson City, MO 65102