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November 21, 2001

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Director, Utility Services
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Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
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FILED

NOV 21 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 **STAFF'S SUGGESTIONS IN SUPPORT OF STIPULATION AND AGREEMENT.**

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

NOV 21 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

**STAFF'S SUGGESTIONS IN SUPPORT OF
STIPULATION AND AGREEMENT**

COMES NOW Staff of the Missouri Public Service Commission (Staff),
and for its Suggestions in Support of the unanimous Stipulation and Agreement
filed in this matter on October 29, 2001, respectfully states:

1. On July 27, 2001, AmerenUE filed proposed tariff sheets with the
Commission that revised its methodology for estimating gas usage in situations
where it is unable to obtain actual meter readings. On August 14, 2001, the
Public Counsel filed a motion to suspend the proposed tariffs to afford it
additional time to evaluate them. The parties successfully negotiated an
agreement regarding the revised tariff provisions and filed their unanimous
Stipulation and Agreement on October 29, 2001.

2. Under the terms of the Stipulation and Agreement, the parties
stated that Staff shall submit to the Commission a memorandum explaining its

rationale for entering into the Stipulation and Agreement. These Suggestions in Support of the Stipulation and Agreement are filed in place of the Memorandum and are intended to meet that requirement.

3. According to the unanimous Stipulation and Agreement, AmerenUE will file tariff sheets in conformance with the specimen tariff sheets in Attachment A to the unanimous Stipulation and Agreement filed in this case.

4. Pursuant to Section 393.140.5 RSMo. (2000), any new tariff language must be lawful, just, reasonable, not unjustly discriminatory and not unduly preferential. The Staff has reviewed the proposed tariff provisions and is of the view that they meet the statutory standards, and that they contain a reasonable procedure for AmerenUE to use to estimate bills for its customers in situations where it is unable to obtain actual meter readings.

5. Staff believes that the specimen tariff sheets that were attached to the Stipulation and Agreement are a significant improvement over the estimated billing language that is currently contained in AmerenUE's tariffs. The new tariff language outlines separate methodologies for single and multiple month estimates, allows for other methods when appropriate, takes into account the customer's response to weather, and specifically identifies the methodologies to be used for non-registering meters.

6. In addition, the proposed tariff language includes a formula for making the calculations. The inclusion of the formula and examples was the only point of contention between the parties prior to the filing of the stipulation. The Office of the Public Counsel (OPC) believed that a formula and examples should

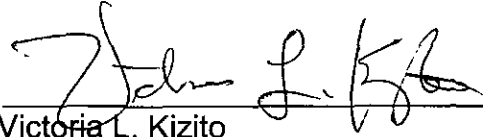
be included in the tariff language. Staff and AmerenUE were opposed to the concept although no specific tariff language had been proposed by OPC. After the filing of Direct Testimony by Staff and AmerenUE, the parties agreed to include the formula that is contained in the specimen tariffs. The examples were not included. Staff believes that the inclusion of the proposed formula strikes the appropriate balance between tariff language that is explicit and tariff language that is not overly voluminous. The addition of the formula did provide additional information but does not require any additional tariff sheets.

7. For the foregoing reasons, the Staff believes the unanimous Stipulation and Agreement has adequately addressed the relevant issues and should be approved by the Commission.

WHEREFORE, for the foregoing reasons, Staff respectfully requests that the Commission 1) issue its Order approving all of the specific terms and conditions of the Stipulation and Agreement filed in this case, 2) enter an Order rejecting the tariff sheets filed by AmerenUE on July 27, 2001, and order AmerenUE to file tariff sheets in conformance with the specimen tariff sheets in Attachment A to the unanimous Stipulation and Agreement filed in this case, and 3) for the Commission to enter its Order before December 27, 2001, the date to which the currently filed proposed tariff sheets have been suspended.

Respectfully submitted,

DANA K. JOYCE
General Counsel

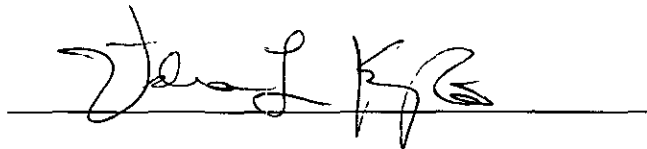


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Certificate of Service

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 21st day of November 2001.



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

Ronald Evans
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