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October 11, 2000

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Director, Utility Services

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Director, Administration

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Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

RE: Case No.EE-2000-561

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,

Bruce H. Bates
Assistant General Counsel
(573) 751-7434
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

FILED³

OCT 11 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric)
Company's Application for a Variance)
from the Provisions of 4 CSR 240-)
13.015(R) and Company's Electric Tariff)
V.I and Gas Tariff VIII.E.)

Case No. EE-2000-561

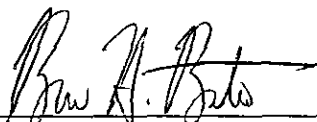
STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its
Recommendation states:

In the attached *Memorandum*, which is labeled *Appendix A*, the Staff recommends that the Missouri Public Service Commission issue an order granting Union Electric Company ("Company") the requested variance from Commission Rule 4 CSR 240-13.015(1)(R), subject to the Company's acceptance of the conditions set out by Staff in the *Memorandum*, and subject to the Staff's review and Commission approval of tariff sheets filed by the Company to initiate its Internet Billing Program and clarify the eligibility requirements of its Budget Billing Plan, all for the reasons stated therein.

Respectfully submitted,

DANA K. JOYCE
General Counsel

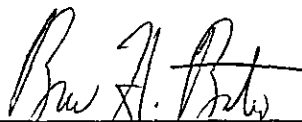


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel or parties of record as shown on the attached service list this 11th day of October 2000.

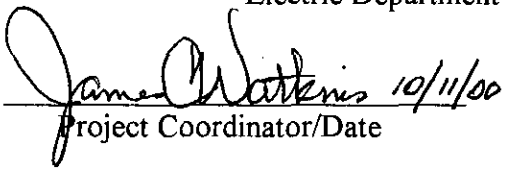


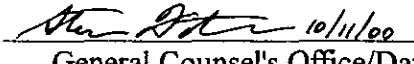
Bruce H. Bates

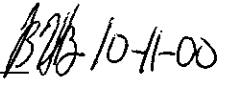
MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EE-2000-561, Union Electric Company

FROM: James C. Watkins, Project Coordinator, Regulatory Economist III
Electric Department – Rates & Tariffs

 10/11/00
Project Coordinator/Date

 10/11/00
General Counsel's Office/Date

 10-11-00

SUBJECT: Staff Recommendation for **Conditional Approval** of a Variance Allowing
“Internet Billing” by Union Electric Company

DATE: October 11, 2000

On March 13, 2000, Union Electric Company, d/b/a AmerenUE (UE or Company) filed an APPLICATION FOR VARIANCE OF UNION ELECTRIC COMPANY seeking a variance from Commission Rule 4 CSR 240-13.015(1)(R) and from the provisions of its electric and gas tariffs limiting participation in its Budget Billing program to customers with postcard billing.

Commission Rule 4 CSR 240-13.015(1)(R) provides: “Rendition of a bill means the mailing or hand delivery of a bill by a utility to a customer.” Company seeks a variance to permit it to render an electronic image of a bill through the use of the Internet, instead of mailing or hand delivering the bill. The Company has partnered with the CheckFree Corporation to provide the electronic presentation of customer bills via the Internet.

The Missouri Public Service Commission Electric - Tariff / Rate Design Staff (Staff), in coordination with the Gas Department and the Consumer Services Department, has reviewed the Application For Variance Of Union Electric Company and the Company’s responses to its Data Requests.

Staff finds that under certain conditions the Company’s entirely voluntary Internet Billing Program would be of benefit to some of its customers without adversely affecting those customers who choose not to use this service. The conditions that the Staff believes are necessary in order to ensure that none of the Company’s customers are adversely affected by this program are as follows:

1. Company guarantees that the Company’s customers who do not use the Internet Billing Program will not be adversely affected by the program.
2. Neither Company nor CheckFree will require a customer to pay any fee for participation in this program.
3. A participating customer will not be required to pay its bill via the Internet using CheckFree’s service. All payment options available to those customers not participating in the program will remain available to those who do.

4. Participating customers will continue to receive postcard bills, unless the customer makes and affirmative election to no longer receive paper bills via the US mail. Any solicitations to customers offering to no longer send paper bills via the US mail must contain a warning that the due date of the customer's bill is the one printed on the bill, or electronic image of the bill. Failure or delay by CheckFree in sending email notification that a bill is available for viewing, or failure or delay by customer in reading the email notification does not alter the due date. Customers should be further advised that email notification may not normally arrive as quickly as the postcard bills under some circumstances.

Staff also finds that there is a need to more clearly describe which customers are eligible for this program and for Company's Budget Billing Plan. This would eliminate the Company's need for a variance from its own tariffs.

Staff recommends that the Commission issue an order granting the requested variance from Commission Rule 4 CSR 240-13.015(1)(R), subject to the Company's acceptance of the above conditions, and subject to the Staff's review and Commission approval of tariff sheets filed by the Company to initiate its Internet Billing Program and clarify the eligibility requirements of its Budget Billing Plan.

Service List for
Case No. EE-2000-561
October 11, 2000

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