

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

In the Matter of the Application of Union)	
Electric Company for Permission and)	
Authority to Construct, Operate, Own)	Case No. EO-2002-351
and Maintain a 345 Kilovolt Transmission)		
Line in Maries, Osage, and Pulaski)	
Counties, Missouri (“Callaway-Franks Line))	

**UNION ELECTRIC COMPANY’S
STATEMENT OF POSITION**

COMES NOW Applicant, Union Electric Company, d/b/a AmerenUE (“the Company” or “UE”), and for its Statement of Position on the Issue presented in this case, states as follows:

STATEMENT OF POSITION

Issue: Is the Application of AmerenUE for permission and authority, that is, a certificate of convenience and necessity, to construct, own, operate and maintain a 345 kilovolt electric transmission line in Maries, Osage, and Pulaski, Counties, Missouri in the public interest, and should it be granted, with or without conditions?

UE’s Position: The Company’s Application is in the public interest because the electric transmission line for which authority is sought is necessary to provide reliable service to UE’s customers, to relieve overloading of UE’s electric transmission system, and to maintain safe conditions on that system. For these reasons, the proposed line provides tangible benefits to the public, including to customers served by UE’s system in general, and to UE customers in mid-Missouri in particular. The proposed line has other public benefits as well in that it enhances the ability of the Missouri rural electric cooperatives in the area to serve their customers through an additional electrical connection. The proposed line is the best electrical solution to address the reliability and overloading problems currently existing on UE’s system.

The route selected by the Company for the proposed line is the least intrusive route to the public. This is because the route largely impacts property owners from whom easements were long ago acquired for a similar line. Also, for most of the route, it requires a more narrow corridor than would be required if another route had been chosen. Other routes are also electrically inferior. In addition, other routes would simply impact a different, similarly situated group of property owners who had no reason to expect that such a line would be built.

The Application should therefore be granted without conditions.

Respectfully Submitted:

UNION ELECTRIC COMPANY
d/b/a AmerenUE

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Dated: September 19, 2002.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, hand-delivered, transmitted by facsimile or mailed first-class, U.S. mail, postage prepaid, to the following parties on this 19th day of September, 2002.

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