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August 29, 2001

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Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
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FILED²
AUG 29 2001
Missouri Public
Service Commission

RE: Case No. EO-2001-521--In the Matter of the Application of Union Electric Company d/b/a AmerenUE For An Order to Approve a Change to the Standard Under Which It Currently Performs Single-Phase Meter Testing.

Dear Mr. Roberts:

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

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams
Associate General Counsel
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Enclosure
cc: Counsel of Record

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

FILED²

AUG 29 2001

*Missouri Public
Service Commission*

In the Matter of the Application of Union)
Electric Company d/b/a AmerenUE For)
An Order to Approve a Change to the)
Standard Under Which It Currently)
Performs Single-Phase Meter Testing.)

Case No. EO-2001-521

STAFF'S RECOMMENDATION

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

1. On March 30, 2001 Union Electric Company d/b/a AmerenUE filed an application seeking Commission approval to change the standard under which it currently performs single-phase meter testing. Rule 4 CSR 240-10.030(28) sets out default standards and provides that the Commission may otherwise order standards. According to AmerenUE, by order dated March 12, 1975 the Commission ordered an alternative standard for meter testing for AmerenUE that employs "the mathematical principles of Statistical Quality Control as set forth in published standards of the United States Military establishments and other government agencies." In this application it seeks to change from these standards to standards set by the American National Standard Institute (ANSI) Sampling Procedures and Tables for Inspection by Attributes and by Variables: ANSI/ASQC¹ Z1.4 and ANSI/ASCQ Z1.9. AmerenUE states that the ANSI/ASQC standards are modernizations of the standards it presently uses.

2. The ANSI Standards were developed from the United States Military criteria that this Commission, in Case No. 18,172, authorized AmerenUE to use to perform single-phase meter

¹ American Society for Quality Control.

testing. The tables used as the basis for the sample-testing program approved for Union Electric Company in Case No. 18,172 are substantially the same as the tables referenced in the ANSI Standard.

3. Sampled testing of meters is utilized to ensure the accuracy of the meters as a whole. Commission Rule 4 CSR- 10.030(29) allows each customer to request testing of their meter at no charge, provided that the meter has not been tested within the last twelve (12) months. This provides AmerenUE customers an opportunity to have their individual meter tested without cost if they question the accuracy of the meter. AmerenUE is presently authorized to use sampled meter testing and proposes in this application to continue doing so, but to change the reference from which it obtains the statistical tables.

4. AmerenUE's recent conversion to automatic meter reading has required both the placement of modules in existing AmerenUE meters and testing to assure they work in the field. During this conversion program many of AmerenUE's existing meters were replaced and each converted meter was tested for accuracy. As a result, AmerenUE now has a more homogenous group of meters in service across its system, each of which it has recently tested for accuracy. This increase in the homogeneousness of AmerenUE's meters across its system should simplify the use of sampled meter testing by AmerenUE.

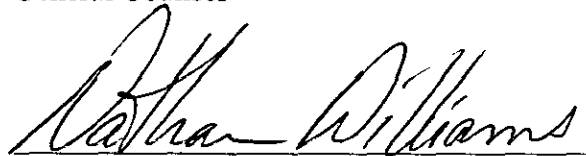
5. In response to this application, the Staff has reviewed both the statistical sampling and testing procedures to test the accuracy of its electric meters that AmerenUE now uses and those that it proposes, and the Staff recommends approval of AmerenUE's request to continue sampled meter testing but to change its sampling method to use standards set by the American National Standard Institute (ANSI) Sampling Procedures and Tables for Inspection by Attributes and by Variables: ANSI/ASQC Z1.4 and ANSI/ASCQ Z1.9. AmerenUE proposes this ANSI reference in lieu of those based on the mathematical principles of Statistical Quality Control as

set forth in published standards of the United States Military establishments and other government agencies that AmerenUE presently is authorized to use.

WHEREFORE the Staff recommends that the Commission grant AmerenUE's request to continue sampled meter testing but to adopt the American National Standard Institute (ANSI) Sampling Procedures and Tables for Inspection by Attributes and by Variables for selecting the number of meters to be tested in lieu of the Commission authorized sampling criteria that it is presently using.

Respectfully submitted,

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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 29th day of August, 2001.



Service List for
Case No. EO-2001-521
Verified: August 6, 2001 (RR)

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