

July 16, 2007

VIA EFIS FILING

Ms. Colleen Dale
Secretary, Chief Regulatory Law Judge
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. ET-2007-0459

Dear Ms Dale:

Please find enclosed the Missouri Energy Group Motion to Amend its July 12, 2007 Response to AmerenUE's Response to Commission Order Respecting AmerenUE's Revised Industrial Demand Response Program Tariff.

Also enclosed for the parties' convenience is a marked copy reflecting the amendments to page 3. I would appreciate your bringing this filing to the attention of the Commission.

Thank you for your assistance in this matter.

Yours truly,



Lisa C. Langeneckert

mkp

cc: All parties of record in Case ER-2007-0002

revision is obviously not the same as that requested by MEG and it is inaccurate to characterize it as so. When referencing the notice period under revision (e), AmerenUE does provide a one-hour interruption, but the credit is so far from reasonable that, even with a one-hour notice period, the tariff is not beneficial. AmerenUE has indicated that it will perform an evaluation of the IDR pilot at the end of the pilot period as noted under revision (f) but has given no structure as to how it will perform this evaluation. In fact, AmerenUE's tariff in this case describes a **plan to develop a plan** in its 2008 Integrated Resource Plan filing, which is due before the IDR pilot is through one year of its three-year time limit. This "plan to develop a plan" is also in direct contradiction to the Commission's Order in ER-2007-0002 directing AmerenUE to "submit a revised tariff **including an evaluation plan** within 30 days from the effective date of this order."³

8. In the IDR tariff filed in this case, AmerenUE presents a tiered system and indicates that MEG did not contemplate more than one tier in the rate case.⁴ AmerenUE did not contemplate more than one tier in the rate case either. In fact, it was not until MEG had provided the IDR tariffs of three other utilities (see Exhibits 1, 2, and 3—KCPL MPOWER Rider (KS), Westar Interruptible Service Rider, and TVA Flat Price Interruptible, respectively) at AmerenUE's request, that AmerenUE offered the tiered system. While it would be reasonable to expect that a utility of AmerenUE's size and experience would review tariffs of other area utilities when devising its own if it were hoping to develop a valid tariff, AmerenUE apparently did not do that. KCPL also has an IDR tariff that is virtually identical in Missouri (see Exhibit 4). Westar and TVA are in the process of updating their tariffs and increasing the credits, and MEG will provide those updated tariffs as soon as they are available.

³ Commission's Final Report and Order in ER-2007-0002 at 104 (emphasis added)