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

In the matter of Union Electric Company,	)	
d/b/a AmerenUE, and its tariff filing to	)	Case No. GR-2003-0517
implement a general rate increase for	)	
natural gas service.	)	

## UNION ELECTRIC COMPANY'S RESPONSE TO THE OFFICE OF THE PUBLIC COUNSEL'S REQUEST FOR RECONSIDERATION

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE"), and pursuant to 4 CSR 240-2.080(16) files its response to the Office of the Public Counsel's (the "Public Counsel") Request for Reconsideration of the Commission's July 25, 2003, Order Modifying Customer Notice (the "Notice") filed in this proceeding on August 1, 2003. In support hereof, AmerenUE states as follows:

- 1. On June 16, 2003, the Public Counsel filed a motion requesting that the Commission modify the Notice which it had ordered AmerenUE to provide its customers in this proceeding in order to make it more informative to customers. AmerenUE and the Commission Staff each filed responses to the Public Counsel's motion in which they offered their views on what should be included in the Notice.
- 2. In response to these pleadings, the Commission revised the Notice. Specifically, the Commission added provisions to the Notice that broke the proposed rate increase down by rate class, showing the actual dollar amount of the monthly increase which would be charged to the average customer in each rate class. The revised Notice also explained that this case does not involve the gas portion of the customer's monthly bill and that the Commission does not regulate wholesale supplier rates.

- 3. In its Request for Reconsideration, the Public Counsel argues that the revised Notice is unreasonable and misleading because it does not provide the percentage increase by customer class. In fact, the Public Counsel goes so far as to argue that the new Notice provides "less information" and is "more misleading" than the original Notice that had been ordered by the Commission.
- 4. AmerenUE completely disagrees with Public Counsel's characterization of the new Notice that the Commission has crafted. The Notice is not misleading at all. In fact, by providing the monthly dollar amount of the proposed increase, by customer class, the Commission has provided customers with a straightforward description of exactly how the proposed increase would impact them. In contrast, showing the proposed increase as a percentage increase in the non-gas portion of the customer's bill, as Public Counsel has proposed, would create the truly misleading impression that residential customers are facing a 78% increase in their gas bills.
- 5. The Notice which the Commission has drafted provides far more information than notices required in past cases. By taking the extra steps of breaking down the increase by customer class and explaining the differences between gas costs and non-gas costs, the Commission has significantly improved the Notice, notwithstanding Public Counsel's unfounded criticisms.

WHEREFORE, for the reasons set forth herein, AmerenUE respectfully requests that the Commission deny the Office of the Public Counsel's Request for Reconsideration.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a AmerenUE

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing *Response* was served via electronic filing with the Missouri Public Service Commission and via electronic mail (e-mail) on this day of August, 2003, to:

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