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August 30, 1999

By Federal Express

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman Building, Fifth Floor
301 West High Street, Room 530N
Jefferson City, MO 65101

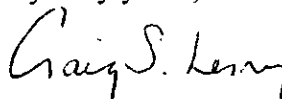
Re: Union Electric Company (Ameren UE),
Case Nos. EO-96-14 and EM-96-149

Dear Mr. Roberts:

In connection with the above-referenced matter, enclosed for filing with the Commission are an original and fifteen (15) copies of the Corrected Proposed Findings of Fact and Corrected Proposed Conclusions of Law of Union Electric Company, d/b/a Ameren UE.

Please "file-stamp" the additional copy and mail it back to me in the enclosed, self-addressed stamped envelope. Thank you for your assistance in bringing this filing to the attention of the Commission, and please call if you have any questions.

Very truly yours,



Craig S. Lerner

Enclosures

FILED²

AUG 31 1999

Missouri Public
Service Commission

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AUG 31 1999

Missouri Public
Service Commission

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

In the Matter of the Monitoring of the)	
Experimental Alternative Regulation Plan of)	Case No. EO-96-14
Union Electric Company)	Case No. EM-96-149

**UNION ELECTRIC COMPANY'S CORRECTED
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Union Electric Company respectfully submits the following corrected Proposed Findings of Fact and Conclusions of Law:

CORRECTED PROPOSED FINDINGS OF FACT

96. A comparison of the counties in which service areas were exchanged reveals that the number of customers increased from 10,891 in the year July 1, 1995 through June 30, 1996 (prior to territorial exchange) to 11,394 in the year July 1, 1997 through June 30, 1998 (after the territorial exchange).

SUPPORTING EVIDENCE:

- a) Exh. No. 29: Union Electric/Black River Coop Territory (late-filed exhibit).
- b) Exh. No. 28: UE's Response to Staff's Data Request 107.
- c) Tr. (Rackers), at 591 (lines 9-12).

COMMENT:

No contrary evidence was introduced.

97. A comparison of the counties in which service areas were exchanged reveals that the customer load increased from 454,115,210 KWHR in the year July 1, 1995 through June 30, 1996 (prior to territorial exchange) to 477,922,388 KWHR in the year July 1, 1997 through June 30, 1998 (after the territorial exchange).

SUPPORTING EVIDENCE:

- a) Exh. No. 29: Union Electric/Black River Coop Territory.
- b) Exh. No. 28: UE's Response to Staff's Data Request 107.
- c) Tr. (Rackers), at 591 (lines 13-20).

COMMENT:

No contrary evidence was introduced.

- 98. A comparison of the counties in which service areas were exchanged reveals that the revenue generated increased from \$23,533,998.06 in the year July 1, 1995 through June 30, 1996 (prior to territorial exchange) to \$24,002,294.24 in the year July 1, 1997 through June 30, 1998 (after the territorial exchange).**

SUPPORTING EVIDENCE:

- a) Exh. No. 29: Union Electric/Black River Coop Territory.
- b) Exh. No. 28: UE's Response to Staff's Data Request 107.
- c) Tr. (Rackers) at 591-92 (lines 9-20).

COMMENT:

No contrary evidence was introduced.

- 99. An analysis of the service areas in which counties were exchanged pursuant to the Black River Agreement reveals that annual revenue increased in the amount of \$468,296.18.**

SUPPORTING EVIDENCE:

- a) Exh. No. 29: (subtracting "amount" in third column from right -- \$24,002,294.12 -- from column on right -- \$23,533,998.06).

COMMENT:

No contrary evidence was introduced.

* * *

120. The actual costs associated with the interstate merger have been less than originally anticipated. As of June 30, 1998, the Company had incurred approximately \$66 million in transaction costs as a result of the interstate merger.

SUPPORTING EVIDENCE:

- a) Exh. No. 7: Gruner Direct, at Schedule 1.

COMMENT:

No contrary evidence was introduced.

* * *

124. In accordance with the terms of the Agreement, the Company amortized the lesser of: (1) the Missouri jurisdictional portion of the total Ameren amount of \$7.2 million (*\$6.2 million*); and (2) the Missouri jurisdictional portion of the total Ameren unamortized amount of actual merger transaction and transition costs incurred to date (*\$66 million*).

SUPPORTING EVIDENCE:

- a) Exh. No. 14: Baxter Rebuttal, at 30 (lines 1-17), at 31-32 (lines 9-3).
- b) Exh. No. 12: Brandt Rebuttal, at 37 (lines 1-16).

COMMENT:

Mr. Gruner acknowledged that both sentences quoted in Finding of Fact No. 122 were relevant in determining the appropriate amortization amount in the Third Sharing Period. See Tr. (Gruner), at 879 (lines 3-4). However, he testified that the general statement reflected in the first sentence -- regarding the amortization period -- controlled the specific provision reflected in the second sentence -- providing the mechanism for

calculating the annual amortization amount. Exh. No. 8: Gruner Surrebuttal, at 2-3 (lines 1-18). See also Exh. No. 11: Robertson Rebuttal, at 12-17 (lines 13-4).

CORRECTED PROPOSED CONCLUSIONS OF LAW

26. In accordance with the terms of the Agreement, the Company amortized the lesser of (1) the Missouri jurisdictional portion of the total Ameren amount of \$7.2 million (*\$6.2 million*); and (2) the Missouri jurisdictional portion of the total Ameren unamortized amount of actual merger transaction and transition costs incurred to date (*\$66 million*).

AUTHORITY:

- a) Exh. No. 14: Baxter Rebuttal, at 30 (lines 1-17), at 31-32 (lines 9-3)
- b) Exh. No. 12: Brandt Rebuttal, at 37 (lines 1-16).

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

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Dated: August 30, 1999

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of August, 1999, I caused copies of the foregoing document to be served, as noted below, upon the following parties:

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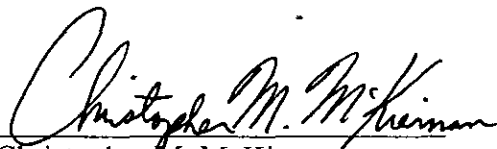
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