

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

OCT 12 2000

In the Matter of an Investigation)
Into an Alternative Rate Option for)
Interruptible Customers of Union)
Electric Company d/b/a AmerenUE)

Case No. EO-2000-580

Missouri Public
Service Commission

**UNION ELECTRIC COMPANY'S
STATEMENT OF POSITION ON ISSUES**

COMES NOW Union Electric Company, d/b/a AmerenUE ("Ameren", "UE" or "the Company") and respectfully submits the following statements of position on the Proposed List of Issues filed by the Commission Staff on September 29, 2000.

A. Should the Commission order Union Electric Company to file tariff sheets to implement the interruptible rate concepts proposed by the MEG Interruptibles?

AmerenUE's Position: No. UE opposes the MEG proposal. That proposal is merely a slight modification of the prior Interruptible 10(M) Rate which was withdrawn earlier this year by agreement between the Company, Staff and MEG.

B. Should such interruptible rate provide for an average discount of \$5.00 per kilowatt per month?

AmerenUE's Position: No. UE cannot justify or support this MEG proposed average discount of \$5.00 per kilowatt month. UE believes that its current market related curtailment Riders L and M provide a more appropriate performance and cost based discount for such service.

C. Should such interruptible rate explicitly provide for the number and cumulative hours of interruptions allowable?

AmerenUE's Position: No. UE believes that the structure of interruptible rates should be flexible to meet various operating conditions, reflective of costs incurred, or potential costs avoided and, therefore, should not explicitly be restricted to the number and cumulative hours of interruptions.

D. Should such interruptible rate explicitly state the conditions under which interruptions may occur, and, if so, should those conditions be such that they are capable of being objectively verified?

AmerenUE's Position: UE believes that the structure of an interruptible rate need not and should not be administratively burdened by attempts to define various conditions under which curtailments may occur but, rather, should be structured on the basis of voluntary market related curtailment price offerings from UE to its customers based on conditions at the time.

WHEREFORE, Ameren respectfully submits its positions in this matter.

Respectfully submitted,

UNION ELECTRIC COMPANY

d/b/a AmerenUE

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Dated: October 12, 2000

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U. S. first-class mail on this 12th day of October, 2000, on the following parties of record:

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