

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

In the Matter of Proposed Rulemaking)	
to Amend Commission Rule)	Case No. EX-2009-0267
4 CSR 240-20.065.)	

COMMENTS OF UNION ELECTRIC COMPANY d/b/a AMERENUE

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company), and for its Comments on the Missouri Public Service Commission's (Commission) proposed amendments to Rule 4 CSR 240-20.065, states as follows:

Background

1. The Notice of Proposed Rulemaking published in the *Missouri Register* required that comments be filed on or before May 1, 2009, and scheduled a hearing for the same day. These Comments are filed in response to that notice.

2. AmerenUE generally supports the proposed amendments to 4 CSR 240-20.065. However, the Company proposes one change to the proposed amended rule for Commission consideration.

3. In 4 CSR 240-20.065(4)(A), the amended rule requires a customer-generator with a system greater than ten kW to carry no less than one hundred thousand dollars of liability insurance. AmerenUE agrees that customer-generators with a system greater than ten kW should carry insurance; however, it believes the Commission should require no less than one million dollars of liability insurance. The rule specifies that this policy is to cover property damage as well as personal injury, including death. One hundred thousand dollars of liability insurance is insufficient to cover the stated risks and this amount should be increased. Further, it is AmerenUE's belief that a customer-generator with a ten kW system (or higher) will not find this requirement to be

unreasonable. A customer-generator of this size is not likely to be a small, residential customer. In fact, it is likely a customer-generator with a system of that size will have at least that level of insurance to cover its own potential liability. As the rule proposes, this insurance may be in the form of an endorsement on an existing policy. Accordingly, AmerenUE requests the Commission to amend this amount to one million dollars.

4. AmerenUE urges the Commission to adopt the rule as published with the change which it is requesting. The Company appreciates the opportunity to provide these Comments.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

/s/ Wendy Tatro
Steven R. Sullivan, # 33102
Sr. Vice President, General
Counsel and Secretary
Wendy K. Tatro, # 60261
Assoc. General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-4014 (fax)
ssullivan@ameren.com
wtatro@ameren.com

Dated: April 30, 2009

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the following on this 30th day of April, 2009:

General Counsel Office
Missouri Public Service Commission
PO Box 360
200 Madison Street, Ste 800
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Office of Public Counsel
Lewis Mills
PO Box 2230
200 Madison Street, Ste 650
Jefferson City, MO 65102
opcservice@ded.mo.gov

*/s/ Wendy K. Tatro*_____

Wendy K. Tatro