

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Proposed Emergency)	
Amendment to Commission Rule)	Case No. GX-2006-0181
4 CSR 240-13.055.)	

AMERENUE'S RESPONSE TO STAFF'S COMMENTS
AND TO THE COMMENTS OF THE MISSOURI GAS UTILITIES

COMES NOW Union Electric, d/b/a AmerenUE ("AmerenUE") and for its response to the Missouri Public Service Commission's Staff's ("Staff") comments, states as follows:

1. On December 7, 2005, Staff filed Comments on the LDC's December 5, 2005 Proposal and on Revenue Neutrality.
2. On December 12, 2005, the Missouri Gas Utilities filed their Verified Response to Staff's Comments.
3. As it has previously stated, AmerenUE shares the concerns of the Office of Public Council ("OPC"), as it believes there is reason to be concerned about an increased number of natural gas customers who will be unable to pay their 2005-2006 winter bills.
4. While AmerenUE was not a signatory to the Missouri Gas Utilities' December 5, 2005 filing, AmerenUE has reviewed the pleading. While AmerenUE intends to comply with any of the proposed amendments that the Commission may elect to adopt, AmerenUE is hopeful that the Commission will recognize that the proposed changes to the Cold Weather Rule will result in increased bad debt expense to Missouri natural gas utilities. Accordingly, AmerenUE believes that the Commission should include an effective mechanism which would allow utilities to recover the increased bad debt cost which is incurred as a result of any Commission ordered change.

5. Accordingly, AmerenUE supports the proposal submitted by OPC on December 2, 2005, coupled with the proposed modifications put forth in paragraphs nine and ten in the Missouri Gas Utilities filing of December 12, 2005.

WHEREFORE, AmerenUE respectfully submits its response and requests that the Commission adopt the OPC's December 2, 2005 amendments to the Cold Weather Rule along with the Missouri Gas Utilities modifications as contained in its filing of December 12, 2005.

Respectfully Submitted,

By 

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Dated: December 12, 2005

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Entry of Appearance was served via electronic filing and electronic mail (e-mail) or via regular mail on this 12th day of December, 2005, to:

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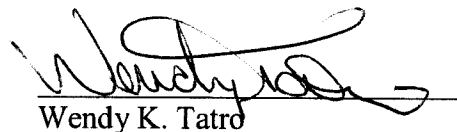
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