

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.	)	

COMMENTS OF AMERENUE

COMES NOW Union Electric, d/b/a AmerenUE (AmerenUE or Company) and for its  
Comments on the Proposed Emergency Amendment to Commission Rule 4 CSR 240-12.055,  
states as follows:

History

1. On October 21, 2005, the Office of Public Counsel (OPC) filed a motion to open a case and to seek an emergency amendment to the Cold Weather Rule, 4 CSR 240-12.055.
2. On October 25, 2005, the Missouri Public Service Commission (Commission) issued an order, titled Notice of Opening Case and Opportunity to File Written Comments. In this order, the Commission set a November 5, 2005 deadline for comments by Missouri natural gas utilities. These comments are to address whether there exists a necessity which would justify the Commission pursuing the OPC's request.
3. Also on October 25, 2005, OPC filed a Motion for Expedited Treatment of its previous request.

AmerenUE's Comments

4. AmerenUE recognizes the likelihood that natural gas customers may face higher bills this winter due to the record increases in wholesale natural gas prices and AmerenUE is concerned about the impact these higher bills may have upon its customers. Because of these concerns, AmerenUE supports efforts to find solutions for customers who may not be able to pay higher bills. To this end, AmerenUE has already taken actions, outside of this docket, to alert customers of the potential for higher winter heating bills and has agreed to waive all

reconnection fees and to suspend deposit requirements for Missouri customers receiving Low-Income Home Energy Assistance Program (LIHEAP) funds or Utilicare assistance.

5. Recognizing that the costs of natural gas this winter may negatively impact a broader group of customers than those eligible to receive funds from LIHEAP or Utilicare, AmerenUE believes it appropriate to consider an amendment to the Cold Weather Rule for this winter.

6. While AmerenUE has some questions about how the amendment proposed by OPC would work, the Commission's order requested comments only on the necessity for an amendment. AmerenUE reserves the right to comment on specific aspects of the proposed amendment at a more appropriate time. However, to the extent any amendment to the Cold Weather Rule causes additional costs to be imposed upon natural gas utilities, AmerenUE believes that a workable mechanism for recovery of these costs should be included in the amendment.

WHEREFORE, AmerenUE respectfully submits its comments on the necessity of the proposed emergency amendments to the Commission's Cold Weather Rule.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By Thomas M. Byrne

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Dated November 3, 2005

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Comments of AmerenUE in Docket No. GX-2006-0181 was served on all parties of record as listed on the attached service list, via United States first-class mail, postage pre-paid, or by electronic mail (e-mail) on this 3<sup>rd</sup> day of November, 2005:

*Thomas M. Byrne*

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Thomas M. Byrne

**MISSOURI PUBLIC SERVICE COMMISSION**

**Case No. GX-2006-0181**

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