

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

Its Attorney

Thomas M. Byrne, Mo. Bar No. 33340
Managing Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue (MC 1310)
St. Louis, MO 63103
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2514
(314) 554-4014 (fax)
tbyrne@ameren.com

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 3rd day of November, 2005:

Thomas M. Byrne

Thomas M. Byrne

MISSOURI PUBLIC SERVICE COMMISSION

Case No. GX-2006-0181

Dana K Joyce
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102

Lewis R. Mills
Office of the Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, Missouri 65102

AmerenUE
Thomas Byrne
1901 Chouteau Avenue
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

Aquila, Inc.
Dean Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102

Atmos Energy Corporation
James Fischer
101 Madison Street, Suite 400
Jefferson City, MO 65101

Fidelity Natural Gas, Inc.
James Fischer
101 Madison--Suite 400
Jefferson City, MO 65101

Kansas City Power & Light Co.
James Fischer
101 Madison--Suite 400
Jefferson City, MO 65101

Laclede Gas Company
Michael Pendergast
720 Olive Street, Suite 1520
St. Louis, MO 63101

Missouri Gas Energy
Dean Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102

Southern Missouri Gas Company
James Fischer
101 Madison--Suite 400
Jefferson City, MO 65101

Aquila Networks-MPS
1815 Capitol Avenue
Omaha, NE 68102

Aquila Networks-L&P
1815 Capitol Avenue
Omaha, NE 68102

ConocoPhillips Company
600 N Dairy Ashford
Houston, TX 77079

Fidelity Natural Gas, Inc.
P.O. Box 669
64 North Clark
Sullivan, MO 63080

Greeley Gas Company
1301 Pennsylvania St., Ste 800
Denver, CO 80203

Laclede Gas company
720 Olive Street
St. Louis, MO 63101

Missouri Gas Company, LLC
110 Algana Court
St. Peters, MO 63376

Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111

Missouri Gas Utility, Inc.
P.O. Box 270868
7810 Shaffer Parkway, Ste 120
Littleton, CO 80127

Missouri Pipeline Co., LLC
110 Algana Court
St. Peters, MO 63376

Ozark Natural Gas Co., Inc.
2580 St. Highway 165
Branson, MO 65616

Southern Mo. Gas Co., L.P.
P.O. Box 847
301 East 17th St.
Mountain Grove, MO 65711

Strategic Energy LLC
Two Gateway Center, 9th FL
Pittsburgh, PA 15222

Union Electric Company
P.O. Box 66149, MC 1310
1901 Chouteau Ave.
St. Louis, MO 63166

Woodward Marketing, L.L.C.
11251 NW Expressway #400
Houston, TX 77092