

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Union Electric Company)	
d/b/a AmerenUE's Purchased Gas)	
Adjustment Factors to be Audited in its)	Case No. GR-2008-0366
2008-2009 Actual Cost Adjustment.)	

STAFF RECOMMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the above-captioned matter and for its recommendation states as follows:

1. On October 17, 2008, Union Electric Company d/b/a Ameren UE (UE or Company), of St. Louis, Missouri, filed four (4) tariff sheets requesting an effective date of November 1, 2008. These tariff sheets were filed to reflect changes in UE's PGA factors as a result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the ACA factor.
2. All of the proposed tariffs are reductions to the Purchased Gas Adjustment (PGA) from UE's June 2008 filings.
3. The amounts of reduction vary depending, among other things, on which interstate pipeline serves the particular area.
4. Even with these reductions to PGA rates, generally customers' overall bills are expected to be higher than last year. Staff's recommendation discusses the specific rates for each of UE's four service areas.
5. Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD)

has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 31, 2009.

6. Staff has reviewed this filing and has determined that it was calculated in conformance with AmerenUE's PGA Clause. Staff is of the opinion that good cause for approval of these tariff sheets on less than thirty (30) days notice is demonstrated by AmerenUE's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings.

WHEREFORE Staff recommends approval of the proposed tariff changes with the rates approved on an interim subject to refund basis with an effective date of November 1, 2008.

Respectfully submitted,

/s/ Lera L. Shemwell

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 21st day of October 2008.

/s/ Lera L. Shemwell