

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

In the Matter of Union Electric Company d/b/a )	
AmerenUE for Authority to File Tariffs )	
Increasing Rates for Electric Service Provided )	<b><u>Case No. ER-2008-0318</u></b>
to Customers in the Company's Missouri )	Tariff No. YE-2008-0605
Service Area. )	

**PUBLIC COUNSEL'S RECOMMENDATIONS FOR LOCAL PUBLIC HEARINGS AND  
RESPONSE TO ORDER RESCHEDULING PREHEARING CONFERENCE**

COMES NOW the Office of the Public Counsel and for its Recommendations for Local Public Hearings and Response to Order Rescheduling Prehearing Conference states as follows:

1. On April 24, 2008, the Commission issued its Order Rescheduling Prehearing Conference in which it, *inter alia*<sup>1</sup>, ordered the parties to file "recommendations as to the times, dates, and locations for local public hearings regarding the proposed rate increase on or before May 20, 2008." Public Counsel files its recommendations in this response.

Union Electric Company d/b/a AmerenUE filed a general rate case along with supporting testimony. Certain portions of the testimony were designated as Highly Confidential.

2. In AmerenUE's last rate case (Case No. ER-2007-0002), the Commission conducted sixteen local public hearings. The hearings were held in St. Louis County and in the City of St. Louis on January 2, in Columbia and Rolla on January 3, in Cape Girardeau and Dexter on January 4, again in St. Louis County and the City of St. Louis on January 8, in Wentzville on January 9, in Kirksville and Hayti on January 10, in Jefferson City and Excelsior Springs on January 11, in Mexico and Moberly on January 12, and in Hillsboro on January 17.

---

<sup>1</sup> The parties are in general agreement as to the other items for which the Commission set a May 20 deadline, and Public Counsel anticipates a joint pleading that will address those.

3. With the exception of three local public hearings in the last case held in locations where AmerenUE provides only gas service, Public Counsel recommends that the Commission conduct the same number of local public hearings in the same locations. In the joint filing discussed in footnote 1, Public Counsel anticipates that the parties will recommend beginning local public hearings the week of September 8. Depending on the Commission's calendar and the availability of meeting rooms, Public Counsel recommends the following thirteen local public hearings:

- Monday, September 8, at 12:00 p.m. at the Thornhill Branch of the St. Louis County Library, 12863 Willowick Drive, St. Louis, Missouri;
- Monday, September 8, at 6:00 p.m. in the auditorium of the Wohl Community Center, 1515 North Kingshighway, St. Louis, Missouri;
- Tuesday, September 9 at 12:00 p.m. in the Century Room of the Millennium Student Center at the University of Missouri-St. Louis, One University Boulevard, St. Louis, Missouri; and
- Tuesday, September 9 at 6:00 p.m. in Highlander 5 Lounge of the Student Center at the St. Louis Community College of Forest Park, 5600 Oakland Avenue, St. Louis, Missouri.
- Wednesday, September 10 at 12:00 p.m. in the ITV Conference Room of the National Guard Armory, 1702 State Highway 114E, Dexter, Missouri;
- Wednesday, September 10 at 6:00 p.m. in the ITV Room of the Hayti High School, 500 North Fourth Street, Hayti, Missouri;
- Thursday, September 11 at 12:00 p.m. in the Arts & Science II Building, Room 301 of Jefferson College, 1000 Viking Drive, Hillsboro, Missouri.

- Thursday, September 11 at 6:00 p.m. in the Board Room of the Wentzville School District Central Office, One Campus Drive, Wentzville, Missouri;
- Monday, September 15 at 6:00 p.m. at the Kirksville Higher Education Center, 2105 East Normal Street, Kirksville, Missouri;
- Monday, September 15 at 6:00 p.m. in Room 305 of the Governor Office Building, 200 Madison Street, Jefferson City, Missouri;
- Wednesday, September 17 at 6:00 p.m. in the ITV Room of the Excelsior Springs High School, 601 Tiger Drive, Excelsior Springs, Missouri;
- Thursday September 18 at 6:00 p.m. in the ITV Room of the Mexico Advanced Technology Center, 2900 Dorelli Lane, Mexico, Missouri;
- Thursday September 18 at 6:00 p.m. in the ITV Room of Moberly Community College, 101 College Avenue, Moberly, Missouri;

While there are certainly many ways to arrange these hearings, this proposal seeks to address the following issues: 1) it organizes them geographically so that Commissioners, Staff and other participants will not have to travel more than necessary; 2) it “doubles-up” several of the hearings that were conducted simultaneously in the last case; and 3) it allows parties to attend the hearings and also participate in the technical/settlement conference that the parties will propose for September 15-17 in Jefferson City.

4. As it did in the last case, AmerenUE will likely suggest fewer local public hearings. The Commission agreed with Public Counsel that a fairly significant number of local public hearings were necessary in that case, and it should do so in this case as well. All of the local public hearings in the last case were well-attended, and there is no reason to expect a different result in this case. AmerenUE may assert that the number of outages and the general

level of customer dissatisfaction lead to the high turn-out in the last case. While Ameren's customer satisfaction level may have improved somewhat, a Post-Dispatch article published today reveals that Ameren finished dead last out of thirty energy utilities in a survey of utility customers conducted by a University of Michigan professor. Furthermore, as the Commission experienced in the current Empire District Electric case, back-to-back rate cases and general economic trends can cause customers to attend local public hearings in high numbers.

WHEREFORE Public Counsel respectfully request that the Commission schedule local public hearings in this case as described herein.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: \_\_\_\_\_  
Lewis R. Mills, Jr. (#35275)  
Public Counsel  
P O Box 2230  
Jefferson City, MO 65102  
(573) 751-1304  
(573) 751-5562 FAX  
[lewis.mills@ded.mo.gov](mailto:lewis.mills@ded.mo.gov)

### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties this 20th day of May 2008.

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

Lewis Mills  
Office Of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opcservice@ded.mo.gov

Kevin Thompson  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Kevin.Thompson@psc.mo.gov

John B Coffman  
AARP  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
john@johncoffman.net

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

James B Lowery  
AmerenUE  
111 South Ninth St., Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
lowery@smithlewis.com

Steven R Sullivan  
AmerenUE  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1300)  
St. Louis, MO 63166-6149  
srsullivan@ameren.com

John B Coffman  
Consumers Council of Missouri  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
john@johncoffman.net

Sherrie A Schroder  
IBEW Local Union 1439  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 1439  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
IBEW Local Union 1455  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 1455  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
IBEW Local Union 2  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 2  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
IBEW Local Union 309  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 309  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
IBEW Local Union 649  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 649  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
IBEW Local Union 702  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
IBEW Local Union 702  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Sherrie A Schroder  
International Union of Operating  
Engineers-Local No 148  
7730 Carondelet Ave. Ste 200  
St. Louis, MO 63105  
saschroder@hstly.com

Michael A Evans  
International Union of Operating Engineers-Local  
No 148  
7730 Carondelet, Suite 200  
St. Louis, MO 63105  
mevans@hstly.com

Michael C Pendergast  
Laclede Gas Company  
720 Olive Street, Suite 1250  
St. Louis, MO 63101  
mpendergast@lacledegas.com

Rick E Zucker  
Laclede Gas Company  
720 Olive Street  
St. Louis, MO 63101  
rzucker@lacledegas.com

Shelley A Woods  
Missouri Department of Natural Resources  
P.O. Box 899  
Jefferson City, MO 65102-0899  
shelley.woods@ago.mo.gov

Lisa C Langeneckert  
Missouri Energy Group  
One City Centre, 15<sup>th</sup> Floor  
515 North Sixth Street  
St. Louis, MO 63101-1880  
llangeneckert@sovg.com

Diana M Vuylsteke  
Missouri Industrial Energy Consumers  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
dmvuylsteke@bryancave.com

Stuart Conrad  
Noranda Aluminum, Inc.  
3100 Broadway, Suite 1209  
Kansas City, MO 64111  
stucon@fcplaw.com

Koriambanya S Carew  
The Commercial Group  
2400 Pershing Road, Suite 500  
Crown Center  
Kansas City, MO 64108  
carew@bscr-law.com

Rick D Chamberlain  
The Commercial Group  
6 NE 63rd Street, Ste. 400  
Oklahoma City, OK 73105  
rdc\_law@swbell.net

**Lewis R. Mills, Jr.**

By:\_\_\_\_\_