314.554.2514 314.554.4014 (fax) tbyrne@ameren.com One Ameren Plaza 1901 Chouteau Avenue PO Box 66149 St. Louis, MO 63166-6149 314.621.3222

August 21, 2002

### **VIA FEDERAL EXPRESS**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, Missouri 65101

**FILED**<sup>3</sup>

AUG 2 2 2002

Missouri Public Service Commission



Re: In the Matter of Laclede Gas Company's Tariff to Revise Natural Gas Rate Schedules / MPSC Case No. GR-2002-356

Dear Mr. Roberts:

Enclosed for filing in the above matter, on behalf of Union Electric Company d/b/a AmerenUE, are an original and eight (8) copies of its *Response to Partial Stipulation and Agreement*.

Kindly acknowledge receipt of this filing by stamping the copy of the enclosed letter and returning it to me in the self-addressed envelope.

Very truly yours,

Thomas M. Byrne

Associate General Counsel

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TMB/mas Enclosures

CC:

MPSC General Counsel
Office of the Public Counsel

FILED®

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

AUG 2 2 2002

In the Matter of Laclede Gas Company's Tariff to	)	Service Commission
Revise Natural Gas Rate Schedules	)	Case No. GR-2002-356

# RESPONSE TO PARTIAL STIPULATION AND AGREEMENT

COMES NOW, Union Electric Company d/b/a AmerenUE, an Intervenor in the above-referenced case ("Intervenor"), pursuant to 4 CSR 240-2.115, and in response to the Partial Stipulation and Agreement filed on August 20, 2002, states as follows:

- On August 20, 2002, Laclede Gas Company, the Missouri Public Service
   Commission Staff and the Office of Public Counsel entered into a Partial Stipulation and
   Agreement (the "Agreement"). The Agreement resolves many of the issues involved in the above-referenced case.
- 2. In response to the Agreement, Intervenor states that it neither supports nor opposes the terms of the Agreement. Further, Intervenor waives its right to a hearing on the matters specifically covered by the Agreement.

WHEREFORE, Intervenor respectfully requests that the Commission accept its response to the Agreement.

Respectfully submitted.

Thomas M. Byrne MBE No. 33340

Union Electric Company

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

(314) 554-2514

(314) 554-4014 (Fax)

tbyrne@ameren.com

ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMERENUE

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Response to Partial Stipulation and Agreement has been duly served upon the General Counsel of the Staff of the Public Service Commission, the Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 21st day of August 2002.

### Office of the Public Counsel

P.O. Box 7800 Jefferson City, MO 65102

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#### Diana M. Vuylsteke

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#### **Ronald Murphy**

Presiding Commissioner Iron County Courthouse 250 S. Main Street P.O. Box 21 Ironton, MO 63650

#### **General Counsel**

Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

#### Lisa C. Langeneckert

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

Thomas M. Byrne