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December 14, 2001

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
Governor's Office Building
Madison & E. Capitol
Jefferson City, MO 65101

FILED³
DEC 14 2001
Missouri Public
Service Commission

RE: Staff of the Public Service Commission v. Union Electric Company, d/b/a
AmerenUE, Case No. EC-2002-1

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are the original and 8 copies of the *State of Missouri's Suggestions in Support of Public Counsel's Motion to Reconsider the Commission's Order Regarding Test Year and Procedural Schedule*. Thank you for your attention to this matter.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General

Ronald Molteni
Assistant Attorney General

mlw

Enclosures

cc: All Parties on the Service List

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³
DEC 14 2001

Missouri Public
Service Commission

Staff of the Missouri Public Service Commission,)

Complainant,)

v.)

Union Electric Company,)
d/b/a AmerenUE,)

Respondent.)

Case No. EC-2002-1

THE STATE OF MISSOURI'S
SUGGESTIONS IN SUPPORT OF
PUBLIC COUNSEL'S MOTION TO
RECONSIDER THE COMMISSION'S ORDER
REGARDING TEST YEAR AND PROCEDURAL SCHEDULE

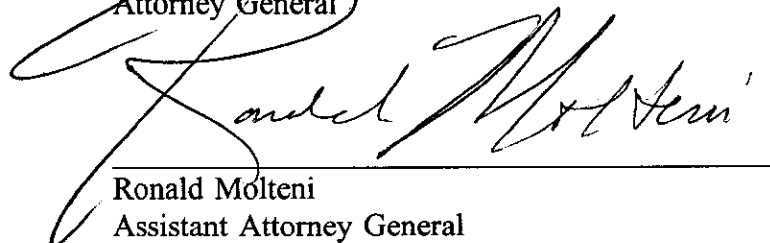
The State of Missouri (the State), through the Attorney General, respectfully requests that the Commission reconsider its order in this case regarding test year and procedural schedule. The Staff and the Office of Public Counsel, in their respective motions have articulated the bases warranting reconsideration of the Commission's order. The State supports those motions. The State will spare the Commission redundancy other than remind the Commission that using AmerenUE's test year will further delay the point in time where AmerenUE's customers cease financing AmerenUE's overearnings. Public Counsel has estimated the current monthly overearning to be on the order \$20.8 millions dollars, based on an estimated overearnings figure of \$250 million per year. (See OPC's Request for Order Setting Evidentiary Hearing, served September 27, 2001.) That is a huge burden to place on the backs of AmerenUE's consumers. Reconsideration of the Commission's Order and in particular, utilizing the test year OPC and Staff requested could substantially mitigate that burden.

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WHEREFORE, the state of Missouri respectfully requests the Commission reconsider its order regarding test year and procedural schedule.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was hand-delivered or mailed, postage prepaid, this 14th day of December, 2001 to:

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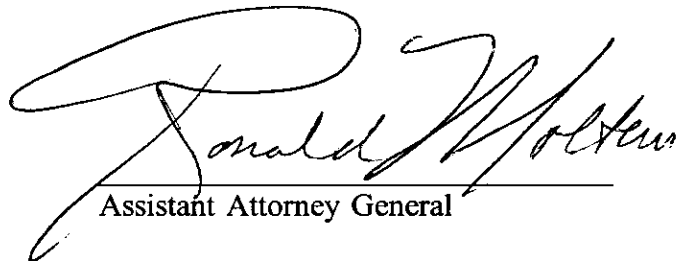
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