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May 23, 2000

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FILED³

MAY 23 2000

Missouri Public
Service Commission

RE: Case No. EC-2000-63 et. al.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **NOTICE OF FILING OF STAFF'S RESPONSE TO COMMISSION ORDERED REPORT.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

David J. Stueven
Assistant General Counsel
(573) 751-6726
(573) 751-9285 (Fax)

DS/dkf
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

MAY 23 2000

Missouri Public
Service Commission

Frank E. Dilley, et. al.
Complainant

v.

Union Electric Company
d/b/a Ameren UE
Respondent

Case No. EC-2000-63 et. al.

NOTICE OF FILING OF STAFF'S RESPONSE TO COMMISSION ORDERED REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Response to Commission Ordered Report states as follows:

1. Between August 2 and September 1, 1999 48 persons filed 43 formal complaints with the Missouri Public Service Commission ("Commission") against Union Electric Company ("UE"). (Section 386.390, RSMo (1994)). On September 22, 1999, UE filed Answers in all 43 cases as well as a motion to consolidate those cases.

2. Section 393.260, RSMo (1994) authorizes the Commission to conduct an investigation, through the Commission's Staff, into complaints such as the 43 complaints referenced above. The Commission also has the regulatory authority to investigate the methods used by an electric corporation, such as UE, to supply electricity, as well as the regulatory authority to order reasonable improvements in said electric corporation's system to best promote the public interest, preserve the public health, and protect those using such electric system (Section 393.140(2), RSMo (1994)). Duly authorized employees of the Commission have the statutory authority to "enter in or upon and inspect the property, buildings, plants factories,

powerhouses, ducts, conduits and offices of any such corporation” (Section 393.140(7), RSMo (1994)).

3. On October 12, 1999, the Commission issued an order that consolidated the complaint cases and directed the Staff to conduct an investigation and file a written report no later than December 6, 1999.

4. On December 6, the Staff filed the Commission Ordered Report and requested the Commission to issue an Order requiring Union Electric to file updates with the Commission on its progress.

5. On February 4, 2000, UE filed its Initial Response to Commission Ordered Status Report of Current and Planed Projects for the Spring of 2000 (UE’s Initial Response).

6. On February 10, 2000, the Commission issued an Order adopting Staff’s recommendation, and required Staff to file responses to UE’s Commission Ordered Reports.

7. On March 10, 2000, Staff filed a response to UE’s Initial Response.

8. On May 10, 2000, UE filed its Second Response to Commission Ordered Status Report of Current and Planned Projects for the Spring of 2000 (UE’s Second Response)

9. Staff has prepared a Memorandum detailing its analysis of UE’s progress. The Memorandum is attached as Appendix A.

8. As stated in Staff’s Memorandum, Staff is satisfied with the work completed to date by UE and with UE’s plan to complete the work by June 15, 2000.

9. UE has offered to file an update on June 20, 2000 to inform the Commission of the status of all projects relating to the service interruptions, which are the subject of these complaints.

9. The Staff recommends that the Commission order UE to file a report on June 20, 2000. Staff will continue to monitor the progress of UE and file a response to UE's June 15, 2000 Commission Ordered Report. Staff will then closely monitor the loads during the summer months on the two feeders at the Brumley Substation.

10. The Staff also recommends that the Commission order UE to file a report on September 15, 2000. This September report would include the peak summer period of 2000 and provide a means of measuring the results of the system improvements. Staff will file a response to UE's September 15, 2000 report.

WHEREFORE, Staff requests that the Commission order UE to file a report on June 20, 2000 concerning project status and order UE to file a report on September 15, 2000 to update the Commission on the results of the improvements made by UE in the area served by the Brumley Substation.

Respectfully submitted,

DANA K. JOYCE
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 23rd day of May 2000.



MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. EC-2000-63, et. al., Frank E. Dilley, et. al., vs. Union Electric Company

FROM: Jim Ketter, Electric Department

[Signature] 5/22/00
Utility Operations Division/Date

[Signature] 5/23/00
General Counsel's Office/Date

SUBJECT: Staff Response to Status Report Concerning Commission Ordered Investigation

DATE: May 22, 2000

Between August 2 and September 1, 1999, forty-eight persons filed forty-three formal complaints with the Missouri Public Service Commission (Commission) against Union Electric Company (UE). These complaints dealt with service problems in an area served by the Brumley Substation, including extensive outages during June and July 1999.

On October 12, 1999, the Commission consolidated the cases and ordered the Staff to conduct an investigation and file a written report with the Commission no later than December 6, 1999. The Staff filed its report on December 6, 1999. In this report, Staff identified a number of items that UE had included in its plan to address the outages in the Brumley area. Among these were substation maintenance, pole inspection and replacement, tree trimming, and shifting electrical load. As UE had not finished all of these projects, Staff recommended that the Commission order UE to file status reports with the Commission on February 1, 2000 and May 3, 2000.

On February 4, 2000, UE filed its Initial Response to Commission Ordered Status Report of Current and Planned Projects for the Spring of 2000 (UE's Initial Response). Staff conducted field inspections on February 9, 2000 in the area served by the Brumley Substation. Staff inspected the work completed by UE subsequent to Staff's December 6, 1999 Report. Staff also reviewed the schedule of work that is to be completed by June 2000, including a three-phase extension along State Highway 42 and a single-phase extension to allow shifting of electrical load to other circuits. Replacement of distribution poles along State Highway C for those poles identified as priority by the outside contractor has been completed. Staff filed a response on March 1, 2000.

On May 2, 2000, Union Electric Company's Second Response to Commission Ordered Status Report Of Current And Planned Projects For The Spring of 2000 (UE's Second Response) was filed. This report contained the scheduled work and a summary of service interruptions. (See Appendix A)

On May 9, 2000, Staff inspected the work completed on the upgrade project. The three-phase upgrade of circuit 129-052 along State Highway 42 is completed. The extension of Phase A of circuit 129-052 will soon begin. Pole locations for approximately ten poles have been staked for this single-phase extension and the necessary easements have been acquired and this project is on

schedule. Once completed, UE will be able to reduce the electric load on the circuit that experienced the service interruptions last summer. Load reduction will be accomplished by transferring the customers along State Highway JJ from Phase A of circuit 129-051 to Phase A of circuit 129-052. Completion of this part of the project is important in meeting the anticipated summer electric loads.

Replacement and re-enforcement of the distribution poles that were inspected by an outside contractor has not been completed. Poles marked for a priority response from UE have been replaced. The Staff will continue to monitor UE's progress in addressing the timely response to pole maintenance.

In UE's Second Response, UE offered to file an update by June 20, 2000. Staff recommends that the Commission order UE to file by June 20, 2000, informing the Commission and the parties that the projects have been completed, or the date by which completion is anticipated.

Further, Staff recommends that the Commission order UE to file a report by September 15, 2000, listing service interruptions during the summer period. Summer of 1999 was the period that was the focus of complaints of service interruptions. This September report would include the peak summer period of 2000 and provide a means of measuring the results of the system improvements. Staff will closely monitor the loads during the summer months on the two feeders at the Brumley Substation to determine if the system upgrades have been effective. Staff will file a response to UE's September 15, 2000 report.

Copies: Director - Utility Operations Division
Director - Utility Services Division
Director - Research and Public Affairs Division
General Counsel
Manager - Electric Department
Toni Messina - Staff
Office of the Public Counsel
Jim Cook - Union Electric Company
Complainants
Senator Larry Rohrbach
Representative Blaine Luetkemeyer

EXHIBIT A
(Page 1 of 4)

October 29, 1999
November 26, 1999 Revised
January 31, 2000 Revised
February 3, 2000 Revised
April 28, 2000 (*) Revised

Feeder 129-051 Phase A
Brumley/Ulman Update

Note: An (*) indicates a revision since the last update

Brumley Substation

Feeder reclosers upgraded from 140 amp to 200 amp;
Xfmr W LTC overhauled;
34kv switch insulators replaced;
34kv strain insulators replaced;
Failed 34kv regulator replaced;
Lid on main tank of Xfmr W leaking and regasketed-transformer placed in-service;
34kv replacement regulator malfunctioning control panel replaced;
Installed culverts and expanded portable substation staging area;
Replaced Xfmr W low side bushings

Lakeside 75 (34kv circuit)

Reliability work including replacement of poles and arresters completed;
(*) 34kv 100 ampere recloser at Brumley Substation overhauled and re-installed;

(*) Infrared Inspection

All 34kv (sub transmission) lines in the Lakeside District are scheduled to be infrared inspected via helicopter during Spring 2000. This inspection will include the sub transmission circuits that supply Brumley substation.

Brumley 129-051

Pole inspection completed;
Tree trimming completed;
Replacement completed for seven poles as identified during pole inspection as requiring prompt replacement;
Added 100-kvar capacitor;
Miscellaneous recloser upgrades for winter peak 1999/2000 completed;

EXHIBIT A
(Page 2 of 4)

Brumley 129-051 feeder relief project (Completion date Summer 2000)

Brumley substation has two three phase feeders that are identified as feeders 129-051 and 129-052. The feeder 129-051 serves the area to the east of Brumley substation and the 129-052 feeder serves the area to the west of the Brumley substation. The three phase ends shortly outside the substation and the feeders thereafter diverge as single phase extensions.

Feeder 129-051 carries approximately 76 per cent of the substation load and feeder 129-052 carries the remaining 24 percent of the substation load. The objective of the feeder relief project is three fold:

- Objective 1: Divert load from feeder 129-051 to 129-052;
- Objective 2: Extend feeder 129-052 westward towards Osage Beach area with the goal of eventually establishing three-phase tie capacity with another substation;
- Objective 3: Eliminate opposite phases on normally open switches to allow for closed transition switching operations.

The relief project includes the addition of approximately 2 miles of 1/0 AAAC conductor in various sections from Brumley substation to Pea Ridge Road to Highway JJ, plus a phase cut and installation of a regulator and miscellaneous switches so that all of the load on Highway JJ can be diverted from feeder 129-051 phase A to feeder 129-052 phase A. This design satisfies all three objectives.

Summer 2000 Projections

Feeder	Before	After
129-051 Phase A	150 Amps	129 Amps

(*) This work is identified as work requests 27LE009974, 27LE010788, 27LE010062 and 27LE010061. The project is approximately 50 per cent completed.

Extended Outages on Feeder 129-051 Phase A

04/20/00 (*)	7 48	DEVICE OVERHD EQUIP MALFUNC MSTRM
11/22/99	4 28	crossarm on LKSD 75 34kv circuit failed (rotten wood)
8/24/99	3 51	customer burning got out of control and created outage
7/29/99	0 29	Failure of 34kv bushing at Turkey Bend Substation

EXHIBIT A
(Page 3 of 4)

7/28/99	2 20	Xfmr on backbone failed and caused fdr to trip
7/25/99	3 14	Primary wire sagged into span guy and primary came down
7/21/99	2 56	Recloser failed under heavy load; replaced
7/18/99	2 43	Recloser opened under heavy load
6/28/99	3 37	34kv ckt open due to arrester failure-Major Storm
6/27/99	4 35	34kv ckt open due to failure of 34kv regulator at Brumley Major Storm
3/09/99	2 34	Primary wire fell down
2/11/99	1 55	Transformer in overhead failed and caused feeder to open

Extended Outage history (*)

(*). There have been no extended feeder outages affecting all of feeder 129-051 phase A since the last reporting period. There have been two major storms and one minor storm that caused a device outages on this feeder and both feeder and device outages in adjacent areas.

(*) Feeder 129-051 Phase A summary: A church experienced a loose transformer secondary connection on April 8, 2000, eight customers experienced a 7 hour and 48 minute outage during the April 20, 2000 wind and lightning storm and an individual customer experienced a several hour outage to his service during the same storm.

(*) March 11, 2000: Six inches of wet snow fell which resulted in over 25 % of the Lakeside District customers experiencing extended outages of several hours. The Brumley feeder 129-051 Phase A was not affected. However, various customers served by Brumley Substation south of Highway 42 experienced lengthy storm related outages.

(*) March 18, 2000 A recloser failed during a thunderstorm which resulted in 165 customers to the immediate north of the Ulman area being out of service for 3 hours and 9 minutes. Mount Carmel substation feeder 205-051 phase A serves this area.

(*) April 20, 2000 Lightning and high winds estimated at 70 mph during the early morning hours resulted in significant tree damage throughout the eastern portion of the Lakeside service territory. Among the areas hardest hit were the Tuscumbia and Brumley areas. Approximately 2100 customers experienced extended outages. The outages for customers supplied from feeder 129-051 phase A are described above.

Momentary Outage History

The momentaries that are shown below are operations of the 34kv Lakeside 75 supply.
Momentaries of the distribution system are not documented as far as time of occurrence.

10/18/99 14:35	MOMENTRY OPERATING ERROR	Calm
07/31/99 23:04	MOMENTRY NO CAUSE FOUND	CALM
06/10/99 14:05	MOMENTRY NO CAUSE FOUND	TSTRM
06/10/99 14:01	MOMENTRY NO CAUSE FOUND	TSTRM
06/19/98 21:20	MOMENTRY SEVERE WEATHER	TSTRM

rjs

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Case No. EC-2000-63
May 23, 2000**

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