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July 3, 2003

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102

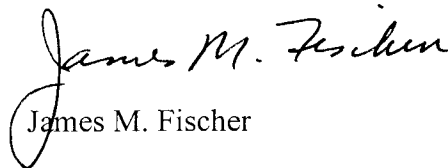
RE: Proposed Amendments to Commission Rule 4 CSR 240-13.055;  
Case No. AX-2003-0193

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the Initial Comments Of Union Electric Company d/b/a AmerenUE. A copy of the Initial Comments has been hand-delivered, emailed, or mailed this date to the counsel listed below.

Thank you for your attention to this matter.

Sincerely,

  
James M. Fischer

Enclosures

cc: Office of the Public Counsel  
General Counsel, Missouri Public Service Commission  
Thomas M. Byrne  
Dean Cooper  
Michael C. Pendergast  
Robert J. Hack  
Douglas Walther

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

In the Matter of a Proposed Amendment to     **Case No. AX-2003-0193**  
Commission Rule 4 CSR 240-13.055             )

**INITIAL COMMENTS OF  
UNION ELECTRIC COMPANY D/B/A AMERENUE**

**COMES NOW** Union Electric Company d/b/a AmerenUE (hereafter "AmerenUE") by and through counsel, and pursuant to the Commission's Notice in the June 2, 2003 edition of the Missouri Register, Vol. 28, No. 11, submits the following comments in response to the Commission's Proposed Rule relating to the reporting requirements under the Commission's Cold Weather Rule, 4 CSR 240-13.055:

AmerenUE supports the proposed rule and believes that it will provide the Commission's Staff with useful information from which they can monitor discontinuance of service and payment activity of customers during each monthly reporting period.

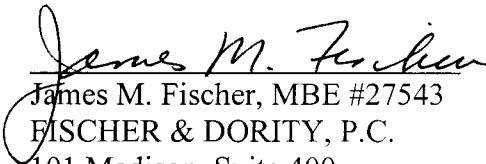
To implement the proposed reporting requirements, AmerenUE must engage in programming of its customer service system to generate the required information for each monthly reporting period. While AmerenUE anticipates the programming cost will be reasonable, it will involve a considerable effort and, therefore, we are reluctant to begin such programming until the proposed reporting rule becomes final. Consequently, AmerenUE is recommending that the final reporting requirements have a delayed implementation to allow for billing system programming and testing in order to meet the proposed comprehensive information requirements. AmerenUE requests that the initial reporting period for supplying the required data pursuant to the proposed rule be the January 2004 reporting month, assuming the rule becomes final no later than October 1, 2003. If the rule becomes final after that date, AmerenUE requests that the first full

monthly reporting period to comply with the rule occur for the reporting month beginning 90 days after the rule becomes final. AmerenUE does not believe this brief transition period will have any material impact on the Commission's monitoring of the Cold Weather Rule administration. However, AmerenUE believes that the delay in reporting as it proposes above will provide the necessary time in which to program and test our systems to ensure we are able to accurately meet the reporting requirements of the proposed rule. AmerenUE therefore respectfully requests the Commission adopt its implementation proposal.

AmerenUE representatives plan to attend the July 9, 2003 hearing on the proposed rule and would be available to respond to any questions on its proposal for a transition period for complying with the proposed rule.

Finally, AmerenUE would like to thank the Commission for the opportunity to participate in the development of the proposed reporting rule.

Respectfully submitted,

  
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and

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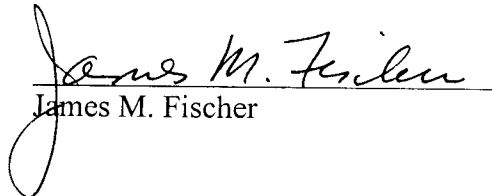
ATTORNEYS FOR UNION  
ELECTRIC COMPANY D/B/A  
AMERENUE

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed, or hand-delivered this 3rd day of July, 2003, to:

General Counsel's Office  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Douglas E. Micheel  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

  
James M. Fischer