BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

AUG 2 9 1997
PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company's) Case No. EO-94-178
Resource Plan Pursuant to 4 CSR 240-22.)

JOINT AGREEMENT AND FILING

Comes now Union Electric Company (UE or Company), Staff of the Missouri Public Service Commission (Staff), and Office of Public Counsel (OPC), pursuant to 4 CSR 240-22.080(8) of the Commission's rules on Electric Utility Resource Planning, and submit this Joint Agreement regarding the recommendations Staff and OPC have made regarding UE's Electric Resource Plan.

This document constitutes a complete agreement among UE, Staff and OPC as to these recommendations. Furthermore, the parties waive their respective rights under section (9) of 4 CSR 240-22.080 to file a response or comments. Therefore, the parties submit that they are not asking for, nor from their perspective is there a need for, a hearing by the Commission. The parties are ready and willing to respond to any questions of the Commission which may arise during its consideration of this complete agreement.

This Joint Agreement and Filing has resulted from extensive negotiation among the signatories and the terms hereof are interdependent. In the event the Commission does not approve and adopt this Joint Agreement and Filing in total, then this Joint Agreement and Filing shall be void and no signatory shall be bound by any of the agreements or provisions hereof.

In the event the Commission accepts the specific terms of the Joint Agreement and Filing,

SCHEDULE FAD-4
Page 1 of 22

that the proposed joint agreement constitutes a reasonable alternative to full compliance with the March 1, 1998 UE filing requirement.

In the joint agreement, UE agrees to brief the remainder of the parties on five occasions up to October 1, 1999. The joint agreement provides in detail what matters will be included in those briefings. Generally those details include information and data regarding load analysis, supply side resource requirements, demand side analysis requirements, demand side screening and program status and contingency plan information.

The parties agree that, in the event there are significant changes in the UE preferred resource plan, the requirements of Chapter 22 will still apply and UE will be required to notify the Commission of its determination to change its preferred plan.

After review the Commission finds the joint agreement to be reasonable and designed to accomplish the intent of the agreement, that is, to shift emphasis from the filing requirements of Chapter 22 of 4 CSR 240 and to go forward with issues that jointly relate to electric resource planning and retail competition in an efficient and effective manner. The Commission will approve the agreement as an alternative plan for compliance by UE with the Commission's integrated resource planning rules, and will order UE to comply with the terms and conditions of the agreement.

IT IS THEREFORE ORDERED:

- 1. That the joint agreement between the parties, appended to this order as Attachment A, is found to be reasonable and in the public interest and is hereby approved in accordance with 4 CSR 240-22.
- 2. That Union Electric Company is hereby ordered to comply with the terms and conditions of the joint agreement.

3. That this order shall become effective on November 14,

1997.

BY THE COMMISSION

Cecil July to

Cecil I. Wright Executive Secretary

(SEAL)

Lumpe, Ch., Crumpton, Murray, and Drainer, CC., concur.

Derque, Regulatory Law Judge

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

At a Session of the Public Service Commission held at its office in Jefferson City on the 4th day of November, 1997.

In	the	Matter	of Unio	n Electric	Company's)	
Res	ourc	e Plan	Pursuan	to 4 CSR	240-22.) .	Case No. EO-94-178

ORDER REGARDING UNION ELECTRIC COMPANY'S INTEGRATED RESOURCE PLAN AND JOINT AGREEMENT

This docket was opened for the purpose of receiving and reviewing periodic integrated resource plan filings of Union Electric Company (UE) pursuant to 4 CSR 240-22 of the Commission's rules. By order of June 11, 1997, the Commission extended the time for UE to accomplish its most recent filing to March 1, 1998 for reason that UE was engaged in a merger transaction which could substantially alter the nature of the data included in such an integrated resource plan.

On August 29 UE, the Staff of the Commission (Staff) and the Office of the Public Counsel (OPC) filed a proposed joint agreement for Commission approval, appended to this order as Attachment A. The joint agreement is intended to provide a method for the parties to shift the emphasis from the filing requirements of 4 CSR 240-22 as they would otherwise apply to UE's second resource plan filing and to go forward with issues that relate to current resource planning and anticipated retail competition as it relates to the electric resource planning process. The joint parties also state that the briefings and detailed periodic reports as set out in the text of the agreement are not intended to be a full and comprehensive substitute for the filing requirements of 4 CSR 240-22 and are intended to achieve different objectives. However, the parties believe

SCHEDULE FAD-4

Page 4 of 22

the parties waive, with respect to the issues resolved herein: their respective rights pursuant to Section 536.080.1 RSMo 1994 to present testimony, cross-examine witnesses, and present oral argument and written briefs; their respective rights to the reading of the transcript by the Commission pursuant to Section 536.080.2 RSMo 1994; and their respective rights to judicial review pursuant to Section 386.510 RSMo 1994.

If requested by the Commission, the Staff shall have the right to submit to the Commission a memorandum explaining its rationale for entering into this Joint Agreement and Filing. Each party of record shall be served with a copy of any memorandum and shall be entitled to submit to the Commission, within five (5) days of receipt of Staff's memorandum, a responsive memorandum which shall also be served on all parties. All memoranda submitted by the parties shall be considered privileged in the same manner as are settlement discussions under the Commission's rules, shall be maintained on a confidential basis by all parties, and shall not become a part of the record of this proceeding or bind or prejudice the party submitting such memorandum in any further proceeding or in this proceeding whether or not the Commission approves this Joint Agreement and Filing. The contents of any memorandum provided by any party are its own and are not acquiesced in or otherwise adopted by the signatories to the Joint Agreement and Filing.

The Staff shall also have the right to provide, at any agenda meeting at which this Joint Agreement and Filing is noticed to be considered by the Commission, whatever oral explanation the Commission requests, provided that the Staff shall, to the extent reasonably practicable, provide the other parties with advance notice of when the Staff shall respond to the Commission's request for such explanation once such explanation is requested from Staff. Staff's oral explanation shall be

subject to public disclosure, except to the extent it refers to matters that are privileged or protected from disclosure pursuant to any Protective Order issued in this case.

I. THE CONTEXT OF THE AGREEMENT

A. The Status of UE's Resource Plans

In December 1996, UE filed with the Commission its revised Implementation Plan, which included descriptions and schedules for the major tasks for the calendar years 1997 and 1998. In that filing, UE's Preferred Resource Plan showed no need to install additional generation capacity until 2002. Since this need is expected to be for peaking or intermediate gas-fired capacity, UE does not need to make decisions about major resource acquisitions until about the year 2000.

The parties to this agreement have also discussed the intention of UE and Central Illinois Public Service Company (CIPS) to consummate their announced merger. There is a consensus that the consummation of this proposed merger would also have an impact upon UE's current Energy Resource Planning process due to plans to jointly dispatch the generation units from both operating companies and plans to engage in resource planning separately for each company.

B. <u>Changes in the Electric Industry</u>

The changes in the electric industry since the Commission adopted its Electric Utility Resource Planning rules have been extensive. In 1993, the electric industry was viewed as having a vertically integrated structure in which the entity reading customers' meters was the same one adding generation plant to meet the growing demands of those same customers. Building new generation plant or contracting for long-term purchases from available capacity were generally

considered the standard ways to meet growing demands. While competitive bidding for supply-side resources was being considered by some utilities in Missouri, the resulting short-term purchased power agreements were primarily seen as a method for filling in reserve requirements on a year-to-year basis. In the context of emerging competition for retail customers, utilities are now looking to short-term purchases acquired through competitive bids as the preferred method for adding capacity.

At the time the Commission's Electric Utility Resource Planning rules were adopted, demand-side resources were either peak shaving or conservation. Peak shaving had the greatest potential for lowering the present value of revenue requirements without raising rates. Competition from alternative energy suppliers has raised a concern by electric utilities about the potential for conservation options raising rates and increasing the likelihood of losing customers. In addition, energy service companies are offering energy services in Missouri which has resulted in most utilities focusing on planning and implementing marketing programs, some of which have demand-side components.¹

C. Reports and Briefings During the Transition

In Missouri, the next several years is being viewed by many as a transition period during which the electric industry's focus will be on issues surrounding retail competition. To accommodate what is believed to be a workable transition for those resources involved in the electric resource planning filings and reviews, this agreement proposes periodic reports and twice-a-year

¹ The distinction between demand-side and marketing programs is that demand-side programs focus on cost-effective alternatives to supply-side alternatives in the resource planning process. Marketing programs are designed to sell energy services in a competitive market environment.

Energy services, at its broadest, is defined as products and services that are related to selling and delivering energy. In the State of Missouri, entities other than utilities can offer energy services, other than energy itself, that can result in improved operational efficiencies to the utilities' customers.

briefings by UE on its resource planning process and implementation plans.

The intention of having scheduled briefings by UE is to provide a forum in which an ongoing dialogue will occur about the increasing effect that the potential for retail competition is having on UE's supply-side and demand-side resource acquisition process. The emphasis on the supply-side will be on the emerging market structures for wholesale generation resources. The demand-side will focus on two basic concerns. First is a concern that market barriers to the least-cost provision of electric services for low-income customers be addressed. Second is a concern that because large customers may be seen as offering a more profitable prospect than small customers, residential and small commercial customers may not have the same opportunities for energy services that are likely to be offered to large customers.

The parties to this agreement recognize the Commission's recent establishment of Case No. EW-97-245, In the Matter of a Commission Inquiry into Retail Electric Competition, as having two possible connections to this agreement. First, a significant level of resources will need to be devoted to the questions raised by the prospect of retail competition. The time and effort of those UE, Staff and OPC personnel required to file and review electric resource plans takes resources away from addressing the critical questions posed by retail competition. Second, there are longer-term questions about how the objectives of the Commission's Electric Utility Resource Planning rules might change or be better implemented in the context of retail competition.

The intent of this agreement is to provide a way for the parties to shift the emphasis from the filing requirements of these Commission rules as they otherwise would apply to UE's second resource plan filing, and go forward on issues that jointly relate to electric resource planning and

retail competition. It is the hope of the parties that this agreement will free significant resources that can then focus on the longer-term questions concerning retail competition rather than be used to file and review UE's second resource plan compliance filing. One of the purposes of the scheduled briefings is to improve the understanding of the parties regarding the impact of retail competition on the electric resource planning process.

The briefings and periodic reports detailed in the next section of this agreement are not intended to be a full and comprehensive substitute for the detailed analysis and filing requirements that are set forth in the Electric Utility Resource Planning rules. (As these briefings and periodic reports may contain information which is highly confidential or proprietary, the provisions of the Protective Order previously issued in this docket will apply.) Since this process is different from the requirements of 4 CSR 240-22, the objectives achieved by this process are different from the objectives that are set forth in 4 CSR 240-22.010. However, the parties believe that this agreement constitutes a reasonable alternative to full compliance with the rule, solely in place of UE's March 1, 1998 filing. UE's next filing pursuant to 4 CSR 240-22 is scheduled for December 6, 1999.

II. THE CONTENT OF THE AGREEMENT

Resource Plan Requirements:

With respect to 4 CSR 240-22 of the Commission's chapter on electric resource planning and in lieu of its March 1998 filing to meet the detailed list of requirements of that chapter, UE agrees to brief the Staff, OPC and intervenors on or about October 1, 1997; April 1, 1998; October 1, 1998; April 1, 1999; and October 1, 1999.

- (1) These briefings shall include information on the following:
 - Any changes in load forecasts for seasonal class energy and peaks with an explanation of those changes;
 - Any changes in implementation plans for both demand-side and supply-side resources with an explanation for those changes; and
 - Any changes in uncertainties, sensitivities, risks and contingency plans with an explanation for those changes.

Load Analysis and Forecasting Requirements:

With respect to 4 CSR 240-22.030 of the Commission's rules and in lieu of its March 1998 filing to meet the detailed list of requirements in 4 CSR 240-22.030, UE will meet the following load analysis and forecasting filing requirements.

- (2) In its October 1997, 1998 and 1999 briefings, UE will provide the information regarding the status of the following activities:
 - An update to its historical data base on driver variables, seasonal energy and peak demands for its major classes;
 - Forecasts of units and use per unit by season for the Residential and Commercial classes;
 - Forecasts of annual energy by end-use for the Residential and Commercial classes;
 - Forecasts of seasonal energy for all other classes;
 - Forecasts of driver variables for all classes at the appropriate level of aggregation; and
 - A report on the load forecast that documents any changes made in load forecasting methods, compares both load forecasts and driver variable forecasts to historical trends and compares load forecasts and driver variable forecasts

to those from the previous year.

Supply-Side Resource Requirements:

Union Electric Company's current resource plan does not show the need for significant supply-side resources until the year 2002. Since this need is expected to be for peaking or intermediate capacity, which has a shorter lead time than base load capacity, UE does not currently need to commit to the purchase of those resources but instead, prior to UE's 2000 decision date, will continue to re-evaluate this need.

With respect to 4 CSR 240-22.040 and in lieu of its March 1998 filing to meet the detailed list of requirements in 4 CSR 240-22.040, UE agrees to provide to Staff and OPC:

- (3) By July 1, 1998 a written report that includes the following elements:
 - An update on the current condition of existing generating facilities;
 - An economic review of improvements considered for existing generating facilities. Improvements include major refurbishments, upgrades and performance improvements;
 - A determination of when improvements to existing facilities may be justified; and
 - A review of uncertain factors that may be critical to the economics of the improvements.

Demand-Side Analysis Requirements:

UE has re-screened a comprehensive list of demand-side measures and provided Staff and OPC with those results twice since its initial (December 1993) resource plan filing. The results from another re-screening at this point are not likely to provide additional information about the cost

effectiveness of the measures.

Since its updated filing in July 1995, UE has met with Staff and OPC several times a year with updates of current and proposed programs. Program design has evolved since its July 1995 filing, due, in part, to additional information on market barriers and customer segments gathered in program evaluation.

In addition, UE has continued to develop and offer energy services through its Marketing and Customer Services Departments and through one of its subsidiaries, UE Development Corporation. Marketing is offering energy services that could fit either in a demand-side management context or in a competitive market environment. Because of the profit potential, competitors are also offering energy services to some of UE's customers.

Low income customers face a significant market barrier from high up-front costs for energy efficiency. It is not clear that the competitive market will meet the need of these customers for basic energy services that are provided in the most cost-effective manner. UE's Customer Service Department offers this market segment assistance through its current Energy Plus programs. These programs include "safety-net" programs designed to help people with immediate needs in paying their electric bills. There are also some universal service programs that help improve the customer's use of energy services through limited weatherization of dwellings and increased information on ways to reduce energy consumption. In addition, there are Energy Plus programs for the elderly and the disabled. UE has provided more details on Energy Plus programs in Attachment 1.

With respect to 4 CSR 240-22.050 and in lieu of its March 1998 filing to meet the detailed list of requirements in 4 CSR 240-22.050, UE agrees to:

- (4) At its October 1, 1997 briefing, provide a written report explaining how demandside measures that have passed the screening process are developed into programs. This report will at least include:
 - demand-side measures included in all current and planned demand-side and marketing programs;
 - for those measures that did not pass measure screening, a description of why they were included in a program;
 - a description of why those measures that passed measure screening were not included in a program; and
 - the demand and energy impacts of current and planned demand-side programs and marketing programs containing demand-side measures.
- (5) UE will continue its evaluation and improvement of currently implemented programs with emphasis on refining customer market segments and identifying the market barriers for these segments. It will also continue to review measures for potential inclusion in demand-side programs. In its twice a year briefings UE will include updates on the status of its demand-side and marketing programs. These updates will include:
 - Estimated demand and energy impacts of implemented and planned programs;
 - Evaluation results on market barriers and customer market segments;
 - Implementation and evaluation schedules;
 - A description of how UE determines whether energy services will be offered for competitive purposes or for other purposes;
 - Its list of current and planned energy services that are or will be offered in UE's service territory by UE or its subsidiaries, or Ameren or its subsidiaries for competitive purposes and those current and planned energy services that are or will be offered for other purposes; and
 - Its progress in providing efficient basic service for low-income customers and coordinating its efforts with social and other agencies and organizations.

Contingency Plan Requirements:

With respect to 4 CSR 240-22.070 of the Commission's rules and in lieu of its March 1998 filing to meet the detailed list of requirements in 4 CSR 240-22.070, UE agrees to:

- (6) Include in its October 1, 1997 briefing the following:
 - A summary of the risk and uncertainty analysis performed in conjunction with the implementation plan filed by UE in December 1996;
 - A discussion of which critical uncertain factors could cause a change in the implementation plan filed by UE in December 1996. Factors such as the following would be considered for inclusion:

purchase power capacity;

delivery mechanisms for DSM;

peak demand growth; and

extended outage of a large existing generating facility.

• A discussion of what actions UE would undertake to mitigate the impact of changes in these critical uncertain factors.

Filing Requirements:

The parties to this agreement understand that if there are any significant changes in the preferred resource plan which UE currently has on file with the Commission, the requirements of 4 CSR 240-22.080(10) still apply. Specifically, UE will notify the Commission within sixty (60) days of its determination to change its preferred resource plan. If this change results in UE's intention to implement resource options before its 1999 filing that are different from those in its

preferred resource plan, UE will include in its filing a revised implementation plan.

WHEREFORE, the signatories respectfully request the Commission to issue its order approving the terms of this Joint Agreement and Filing as soon as practicable.

Respectfully submitted,

Steven Dottheim

Missouri Bar No. 29149

P. O. Box 360

Jefferson City, MO 65102

Telephone (573) 751-7489

Fax: (573) 751-9285

ATTORNEY FOR THE
MISSOURI PUBLIC SERVICE
COMMISSION STAFF

Lewis R. Mills, Jr.

Missouri Bar No. 35275

P. O. Box 7800

Jefferson City, MO 65102

Telephone: (573) 751-5560

Fax: (573) 751-5562

ATTORNEY FOR THE OFFICE OF THE PUBLIC COUNSEL

Joseph H. Raybuck By SD

Missouri Bar No. 31241

Mail Code 1310

P. O. Box 66149

St. Louis, Missouri 63166

Telephone: (314) 554-2976

Fax: (314) 554-4014

ATTORNEY FOR UNION ELECTRIC COMPANY

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 29th day of August, 1997.

Steven Dote

Attachment 1

ENERGY PLUS PROGRAMS

Universal Service Programs

ENERGY PLUS GRANTS PROGRAM (\$60,000*)

The Energy Plus Grants program funds organizations across Union Electric Company's service area to improve the weather-worthiness of the homes of elderly, low-income or handicapped residents.

Nonprofit organizations are eligible to receive these grants for a wide range of energy-related projects.

Grants are used to purchase weatherization materials or to enhance an existing efficient use of conservation programs.

Some of the grants have been awarded to help organizations conduct energy workshops, train youth groups for weatherization work and provide weatherization materials to older adults. Grants are awarded to support highly localized needs not covered by more structured Energy Plus Programs.

WEATHERIZATION KITS (\$75,000*)

Union Electric provides kits of energy-saving materials to its senior customers. Each fall, volunteers help install kits in many locations throughout UE's service area.

Kit materials include door sweeps and self-adhesive V seals; foam gaskets for electrical switch plates and outlet plates; rope caulk and transparent tape; reusable plastic and snap-in channels for windows.

Weatherization can cut customers' annual energy costs by at least \$40. The material can be removed and re-used.

SCHEDULE FAD-4 Page 17 of 22

YOUTH EMPLOYMENT OPPORTUNITIES (\$70,000*)

This program has been eliminated beginning in 1998

Since 1984, Union Electric has worked with local social service and government organizations to sponsor youth employment programs during the summer months. Through these programs, thousands of youths have found employment, and thousands of homes have been weatherized.

Teams of young people weatherize the living units of senior citizens and needy people by installing heavy duty plastic on windows and caulking and weather-stripping around doors and windows. In 1992, the Air Conditioning Program merged with Youth Employment Opportunities.

ENERGYWISE/ENERGY SMART (\$10,000*)

Through the EnergyWise/EnergySmart Program founded in the 1980s, Union Electric retirees offer money-saving energy conservation tips and general information to senior citizen groups in UE's service area.

EnergyWise is a 30 to 40 minute program that concentrates on no-cost/low-cost ways to reduce energy consumption and save money in the process. A videotape show outlines the basics of home energy efficiency, and team members use tabletop exhibits for "live" demonstrations of several weatherization tips.

EnergySmart, a 40 to 50 minute program involving audience participation, acquaints UE's senior customers with programs UE has available for them, including all Energy Plus Programs.

An Energy Services guidebook containing conservation, health and safety tips is used as the primer for an Energy IQ test for program participants.

NITE LITE PROGRAM (\$150,000*)

Nite Lite is a cooperative program involving neighborhood organizations, local police and Union Electric to help hundreds of city residents use porch lights to fight crime.

As a partner in Nite Lite, UE provides energy-saving compact fluorescent lights to neighborhood organizations for distribution to residents.

Working with local police, the neighborhood organization develops and implements a plan to insure the fluorescent bulbs are installed and turned on at night to deter crime. These bulbs' operating costs are one-fourth that of regular light bulbs.

UE also provides grants to neighborhoods to assist with the installation of wiring and motion detectors.

SCHEDULE FAD-4 Page 18 of 22

Safety Net Programs

DOLLAR MORE (\$950,000 from customer contributions)

Established in 1982, Union Electric Company's Dollar More Program provides an outlet for UE customers interested in making voluntary contributions to energy assistance funds that help low-income families.

Contributions are distributed by United Way agencies to a network of human service agencies in the areas where contributors live. To contribute, customers simply mark a box on their bills, indicating a willingness to contribute and a pledge amount, or they can call UE to receive pledge cards.

Pledges are listed as an additional item on the customer's monthly bill and can be canceled or changed at any time by contacting UE.

UNION ELECTRIC DOLLAR MORE COMPANY PROGRAM (\$200,000*)

Union Electric's Corporate Dollar More provides funding for utility assistance. Corporate Dollar More funds come from UE's Charitable Trust and go to local social service agencies that have established energy assistance programs. Many recipient agencies use the Corporate Dollar More funds as a means to encourage other donors to match UE's funds.

CUSTOMER ASSISTANCE PROGRAM (\$840,000*)

Union Electric Company has established a program designed to address the underlying causes of sudden, erratic bill payments.

To respond to the needs of customers who are in a crisis of a non-recurring nature, UE's Customer Assistance Program (CAP) has resulted in the restoration of financial stability for more than a third of those referred to the program. Another 55 percent of CAP's clients make significant progress toward stability.

Established in 1986, CAP is administered by Provident Counseling, a social service outreach agency, through a contractual arrangement with Union Electric.

Each CAP counselor is a professional social worker knowledgeable about community resources and trained to develop a course of action for referred customers. CAP helps customers by assessing social service and financial needs, evaluating customer resources, assisting in budgeting and concentrating on helping customers find solutions that will foster long-term stability by providing:

SCHEDULE FAD-4 Page 19 of 22

3

- Initial assessment of social service and financial needs.
- Evaluation of the current and potential resources.
- Assistance in making payment arrangements with Union Electric.
- Referrals to appropriate community and/or government resources.
- Information on energy conservation options.
- Development of a realistic household budget.
- Liaison with private/public agencies.

The organization refers customers to appropriate agencies. CAP also provides energy conservation options and serves as the liaison with private and public agencies.

Other Energy Plus Programs

URBAN LEAGUE COMMUNITY OUTREACH PROGRAM (\$60,000*)

The Urban League Community Outreach Center was made possible through a grant from Union Electric Company. The center has received funds, in-kind services and material contributions from a number of St. Louis-based corporations.

Centrally located, at 4151 Olive Street in St. Louis, the center operates the only local food bank that is open daily.

AIR CONDITIONING PROGRAM (\$80,000*)

Since 1988, Union Electric, with air conditioning unit wholesale supplier Marco Sales, Inc., has funded a program that provides free air conditioning units to older, medically certified persons.

The program is coordinated by Senior Home Security, a not-for-profit organization that provides, among other services, energy conservation assistance to elderly and physically disabled persons. Another program partner is Operation Weather Survival, a consortium of social service agencies.

To qualify, recipients must have proof from attending physicians that they require air conditioning for medical reasons. The window units are loaned to recipients, who are also eligible for a grant from Union Electric's Dollar More Program to help pay energy bills.

UE began its partnership with Senior Home Security, Inc., to offer youths a viable skill in the repair and installation of air conditioning units. The youths also weatherize homes by putting plastic on the windows, caulking and weather-stripping around the doors and windows.

LIFE SUPPORT SERVICE

Once Union Electric knows that a customer has life support equipment in a home, that information is entered into a computerized life support equipment registry.

Union Electric notifies customers about planned maintenance outages and gives a suggested backup plan for emergency outages. Customers have been registering for this service for several years. Customers can call Union Electric for registration forms.

SERVICES FOR SPEECH AND HEARING IMPAIRED

Since the mid-1970s, Union Electric has offered a special computerized phone hook-up that lets UE communicate with speech and hearing impaired customers. If those customers have a telephone device known as a telecommunications device for the deaf (TDD or TDY), they can call UE directly and ask questions about billing, service or anything else pertaining to Union Electric.

BRAILLE BILLING

Many customers have taken advantage of the Braille bill developed by Union Electric for the blind since it was created in January 1990.

LARGE PRINT BILLS

In October 1992, UE created a large print bill for the visually impaired customer as a supplement to the regular bill.

All customers served by UE are eligible to receive this bill, which is sent along with a regular bill. In large print, it lists the dates of service, the customer's account number and address, usage amounts, current amount, prior balance, budget billing amount (if the customer has signed up for that service), the total amount due and the payment due date.

HOSPITAL STAY FOR THE ELDERLY

UE customers age 60 and older, who are in the hospital, are eligible for UE's Hospital Stay Program.

SCHEDULE FAD-4 Page 21 of 22 While in the hospital, the customer will not receive delinquent notices if the UE bill is not paid. Also, the customer's service will not be disconnected due to non-payment while he/she is in the hospital. UE will work with the customer to make payment arrangements.

DEFERRED PAY-DATE

Through this program, established in 1986, Union Electric allows customers receiving retirement benefits or disability payments to delay paying their Union Electric bill for up to 21 days.

This allows that customer to pay the bill when he or she receives retirement or Supplemental Social Security income checks, easing a budget crunch that can occur when the UE bill arrives earlier in the month than benefit payments.

To qualify for Deferred Pay-Date, UE customers must be at least 60 years old and permanently retired or disabled and receiving Supplemental Social Security income. The customer must pay the electric bill in full every month on or before the special extended due date.

THIRD PARTY NOTIFICATION

Union Electric will contact the families of registered elderly or customers with disabilities before disconnecting service for nonpayment of utility bills.

Customers must be at least 60 years old or disabled to receive this service.

GATEKEEPER

Focusing on older adults who live alone and have little contact with others, UE's Gatekeeper Program involves those Union Electric employees who have contact with the public as part of their normal workday. These employees receive special training to recognize when an older person may need help.

The trained UE Gatekeeper who observes a warning sign -- an overgrown lawn, newspapers piled up or a confused or disoriented senior -- starts the process by alerting appropriate officials. The agency assesses the need for intervention and arranges appropriate assistance.

SCHEDULE FAD-4 Page 22 of 22