

Exhibit No.:
Issues: Rate Design; Tariffs
Witness: Wilbon L. Cooper
Sponsoring Party: Union Electric Company
Type of Exhibit: Direct Testimony
Case No.: GR-2010-_____
Date Testimony Prepared: June 11, 2010

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. GR-2010-_____

DIRECT TESTIMONY

OF

WILBON L. COOPER

ON

BEHALF OF

**UNION ELECTRIC COMPANY
d/b/a AmerenUE**

**St. Louis, Missouri
June, 2010**

TABLE OF CONTENTS

I. INTRODUCTION 1

II. PURPOSE AND SUMMARY OF TESTIMONY 2

III. RATE DESIGN..... 3

IV. PRICING..... 8

V. MISCELLANEOUS TARIFF REVISIONS..... 10

1 **DIRECT TESTIMONY**

2 **OF**

3 **WILBON L. COOPER**

4 **CASE NO. GR-2010-_____**

5
6 **I. INTRODUCTION**

7 **Q. Please state your name and business address.**

8 A. My name is Wilbon L. Cooper. My business address is One Ameren
9 Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

10 **Q. By whom and in what capacity are you employed?**

11 A. I am employed by Union Electric Company d/b/a AmerenUE
12 (“AmerenUE” or “Company”) as the Manager of the Rates and Tariff Department.

13 **Q. What is your educational background, work experience and duties of**
14 **your position?**

15 A. I have a Bachelor of Science degree in Electrical Engineering (BSEE)
16 from the University of Missouri-Rolla.

17 I was employed as an Assistant Engineer in the Rate Engineering
18 Department of Union Electric Company in June 1980. My work included assignments
19 relating to the general analyses and administration of various aspects of Union Electric
20 Company’s electric, gas, and steam rates. In October 1989, I was appointed Supervising
21 Engineer – Rate Analysis. In this position I was responsible for meeting the analytical
22 requirements of the Company's retail gas and electric rates and wholesale electric rates,
23 including load research and various cost of service and rate design studies, as assigned. I
24 was appointed to my present position of Manager of Rates and Tariffs in March 2003.

1 I currently have responsibility for the general policies and AmerenUE's
2 electric and gas rate tariffs, riders and rules and regulations tariffs on file with the
3 Missouri Public Service Commission ("Commission") and in the participation in various
4 proceedings before this regulatory agency. In addition, Rates and Tariffs is responsible
5 for conducting class cost of service and rate design studies, and participation in other
6 projects of a general corporate nature, as requested by Stephen M. Kidwell, Vice
7 President Regulatory and Legislative Affairs.

8 I have previously submitted testimony before the regulatory commissions
9 of Missouri, Illinois, and Iowa.

10 **II. PURPOSE AND SUMMARY OF TESTIMONY**

11 **Q. What was your responsibility in the preparation of this case and what**
12 **is the extent and purpose of this testimony?**

13 A. My responsibility includes the overall coordination and preparation of
14 a) the weather normalized test year sales and revenues along with other miscellaneous
15 test year billing adjustments (which are addressed in more detail in the direct testimony
16 of Company witness James R. Pozzo); b) the development of a fully allocated class cost
17 of service study (addressed more fully in the direct testimony of Company witness
18 William M. Warwick); and c) the design and development of the proposed individual
19 customer class rates and associated tariffs. My testimony will specifically address only
20 the rate design and certain other tariff changes being proposed in this case.

21 **Q. Have you prepared or have there been prepared under your direction**
22 **and supervision a series of schedules for presentation to the Commission in this**
23 **proceeding?**

24 A. Yes. I am sponsoring Schedules WLC-G1 through WLC-G6

1 structure of the monthly customer charge and flat charge per Ccf, within the Company's
2 Residential Rate, to the more complex set of customer and blocked per Ccf charges for
3 interruptible and assurance gas in the Company's Interruptible Service Rate. In all
4 instances, however, the charges within each specific rate class are established such that
5 the application of these individual charges to the total annual or test year customer class
6 usage is designed to result in the collection of the annual revenue requirement of each of
7 the Company's rate classes.

8 **Q. What were the Company's principal objectives in the design and**
9 **development of the proposed individual customer class rates that reflect the**
10 **Company's proposed full rate increase?**

11 A. The Company's principal objectives were: 1) to have total revenue from
12 the proposed rates equal the annual test year revenue requirement of each proposed
13 customer class; 2) to have the design of each rate reflect the class cost of service study as
14 nearly as practicable with due consideration to other general rate design principles; 3) to
15 split the current General Service Classification into two separate rate classes; 4) to further
16 split the Standard Transportation Service rate into a Small and Large Standard
17 Transportation Service rate; and, 5) to combine or merge the Company's two Purchased
18 Gas Adjustments into one PGA for the Company's entire Missouri natural gas operations.

19 **Q. Has the Company developed a recommendation for the splitting of the**
20 **Company's current General Service Classification into two separate rate classes?**

21 A. Yes, Company witness Mr. Warwick's direct testimony provides the
22 rationale for splitting of this customer class into a "Small General Service" and a "Large
23 General Service" group.

1 **Q. Please explain the fourth rate design goal mentioned above of splitting**
2 **the current Standard Transportation Service rate into a Small and Large Standard**
3 **Transportation Service rates.**

4 A. This split was made to render existing General Service customers
5 substantially indifferent as to whether the customer takes Company supplied gas service
6 (General Service offering) or third party supplied gas service (Standard Transportation
7 Service offering). This approach is consistent with the Company's current rate design of
8 the General Service rate and the Standard Transportation service rate which are closely
9 matched--that is, the customer charges and first block rates are identical.

10 **Q. Mr. Cooper, earlier you mentioned the Company's goal to combine or**
11 **merge its two PGAs into one PGA for the Company's entire Missouri natural gas**
12 **operations, please explain.**

13 A. AmerenUE witness Ms. Emma Cruthis' direct testimony explains the
14 significant benefits of this combination or consolidation. A combined PGA promotes
15 simplicity and ease of customer understanding and, also, promotes uniformity of tariff
16 application; therefore, resulting in more efficient and effective administration of the
17 Company's retail natural gas rates in Missouri.

18 **Q. What is the first step in determining each proposed customer class'**
19 **test year revenue requirement?**

20 A. The costs of serving each proposed customer class were developed in a
21 study sponsored by Mr. Warwick in his direct testimony in this case. Such revenue
22 requirements reflect Mr. Warwick's adjustments of proposed class revenue requirements
23 to produce equal class rates of return. Schedule WLC-G4 (also Mr. Warwick's Schedule
24 WMW-G1) summarizes the results of the Company's class cost of service study,

1 indicating the rate of return on rate base currently being earned on the service being
2 provided to each major retail customer class. The basic starting point for this study was
3 AmerenUE witness Thomas G. Opich's test year jurisdictional cost of service study.

4 **Q. What general conclusions can be drawn from the information in**
5 **Schedule WLC-G4?**

6 A. The Residential class is providing a below average rate of return at present
7 rate levels, while the remaining classes are providing above average rates of return at
8 present rate levels. Overall, as is suggested by the filing of this case, the Company is
9 earning an inadequate return on its rate base.

10 **Q. Please identify Schedule WLC-G5.**

11 A. Schedule WLC-G5 summarizes the class revenue requirements necessary
12 to give the Company an opportunity, based upon test year figures, to achieve an equal
13 rate of return from each of its proposed customer classes. This information was
14 developed from the cost of service data contained in Schedules WMW-G1 and
15 WMW-G2 of Mr. Warwick's direct testimony and is based upon the Company's
16 proposed level of Missouri retail revenues.

17 **Q. Once the annual "cost-based" revenue requirements was developed by**
18 **this process for each customer class, would the design of specific rates for each**
19 **customer class be the next and final step in the overall rate development process?**

20 A. If one were to base class rates solely on class cost of service, the response
21 would be yes. However, the results of Mr. Warwick's study produced the following base
22 or margin rate revenue increases by customer class:

1

Customer Class	<u>Cost of Service</u> <u>Based Rate Increase</u>
Residential	28%
Small General Service	12%
Large General Service	14%
Interruptible Service	-4%
Standard Transportation	-22%
Large Volume Transportation	-17%

2

3 It should be reinforced that the above “increase” percentages do not reflect the true
4 impact on a customer’s bill. Typically, the base rate or margin component of a gas sales
5 customer represents a third or less of the total bill. The remaining component of the bill
6 is gas supply or PGA costs which typically represent two-thirds or more of a sales
7 customer’s bill. As a result, the percentage increases above should be divided by three
8 for a rough estimate of the impact on total customer bills.

9 **Q. Is the Company proposing the use of cost-based class revenue**
10 **requirements in this case?**

11 A. No, considering the cost-based 28% increase to the residential class and
12 the 4%, 22%, and 17% reductions to the Interruptible Service (“IS”), Standard
13 Transportation (“ST”), and Large Volume Transportation (“LVT”) classes, respectively,
14 the Company is proposing to maintain existing revenue levels for the IS, ST, and LVT
15 classes and to reduce the cost-based Residential class’ revenue requirement by the
16 equivalent of the cost-based reductions to the IS, ST, and LVT classes. The Company

1 recognizes the importance of cost-based rates; however, other rate principles may be used
2 to guide rate design. These principles include, but are not limited to, rate impact, rate
3 stability, and public acceptability. While all customers have been hit hard by the global
4 financial crisis of 2008 to date, residential consumers have little to no opportunity to pass
5 those increases on to others as do businesses or, in many cases, to afford to invest in
6 conservation or other energy sources. Due consideration to cost of service, rate impact,
7 rate stability, and public acceptability rate principles provide support for the
8 reasonableness of the Company's proposal. Under the Company's proposal, IS, ST, and
9 LVT classes would be no worse off than they are today, while residential customers will
10 have their cost-based revenue requirement mitigated to some extent. With regard to the
11 Small General Service and Large General Service rate classes, the Company's proposed
12 rate design tracks the cost of service based revenue requirements.

13 **Q. Please identify Schedule WLC-G6.**

14 A. Schedule WLC-G6 summarizes the class revenue requirements necessary
15 to give the Company an opportunity, based upon test year figures, to achieve its proposed
16 rate of return while recognizing the Company's proposal to maintain existing revenue
17 levels for the IS, ST, and LVT classes and to reduce the cost-based Residential class'
18 revenue requirement by the equivalent of the cost-based reductions to the IS, ST and
19 LVT classes.

20 **IV. PRICING**

21 **Q. Mr. Cooper, how were the charges within the Residential Service Rate**
22 **adjusted to recover the proposed class revenue requirements?**

23 A. The residential class monthly Customer Charge was increased to \$20.50,
24 which moves to the full recovery of customer-related costs that was quantified in the

1 class cost of service study performed by Mr. Warwick. The Company's proposal
2 represents an increase of \$5.50 per month over its existing residential customer charge of
3 \$15.00. The remainder of the residential class's proposed revenue requirement will be
4 recovered through the volumetric Delivery Charge.

5 **Q. How were the charges within each non-residential rate schedule**
6 **adjusted to recover each class' proposed class revenue requirement?**

7 A. The class Customer Charges were increased to levels which are closer to
8 the full recovery of customer-related costs as quantified in the direct testimony of
9 Mr. Warwick. The resulting class revenues provided by the proposed Customer Charges
10 were subtracted from each class' cost-based revenue requirement as adjusted, where
11 applicable, to effectuate the mitigation of the cost-based increase for the Residential
12 class. The remaining revenue requirement for these classes was then recovered through
13 the volumetric Delivery Charges while maintaining the existing rate design for
14 application to all non-residential customers. The Company is proposing to maintain this
15 design to minimize any concerns relating to rate migration or rate continuity.

16 **Q. Do the proposed rates recover each class' respective cost of service**
17 **based revenue requirement?**

18 A. The proposed rates for the Small General Service and Large General
19 Service classes recover the class' respective cost of service based revenue requirement.
20 However, while the proposed rates for the Company's Residential, Interruptible Service,
21 Standard Volume Transportation, and Large Volume transportation rates recover the
22 cost-based revenue requirement on a combined basis, the individual class revenues do not
23 match the cost of service based revenue requirement due to the mitigation of the proposed
24 residential cost-based increase mentioned earlier.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

V. MISCELLANEOUS TARIFF REVISIONS

Q. What other changes is the Company proposing to its tariffs?

A. The direct testimonies of Ms. Cruthis and James J. Massmann address in detail the Company’s proposed tariff changes related to the consolidation of the Company’s two PGAs into one, the removal of Rider B PGA Transition Mechanism, the addition of a Gas Supply Incentive Plan (GSIP), changes related to gas transportation provisions, and certain other minor tariff revisions. I will address a tariff change related to the payment period for non-residential customers and, also a tariff change related to the Company’s Infrastructure System Replacement Surcharge (“ISRS”).

Q. Please describe the tariff change that is being proposed to modify the “Payment” language of each of the Company’s non-residential service classifications.

A. The Company is proposing to extend the delinquent date of the payments from non-residential customers to twenty-one days (21) from the current ten (10) days. Said proposal is consistent with the Missouri Public Service Commission’s approval of a similar change for the Company’s retail electric operation in the “First Nonunanimous Stipulation and Agreement” in Case No. ER-2010-0036, and also eliminates the administrative burden of managing conflicting delinquent payment dates for combination gas and electric customers.

Q. Please describe the tariff change that is being proposed to modify the Company’s Infrastructure System Replacement Surcharge.

A. Section 6(1) of Missouri Revised Statutes Chapter 393.1010 states, in part, that “A gas corporation that has implemented an ISRS pursuant to the provisions of sections 393.1009 to 393.1015 shall file revised rate schedules to reset the ISRS to zero

Direct Testimony of
Wilbon L. Cooper

1 when new base rates and charges become effective for the gas corporation following a
2 commission order establishing rates in a general rate proceeding ...” The Company’s
3 proposed revision to its ISRS tariff has reset the ISRS to zero.

4 **Q. Does this conclude your direct testimony?**

5 A. Yes, it does.

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

TABLE OF CONTENTS

	<u>Sheet Numbers</u>
<u>Service Areas</u>	3
* <u>Rates:</u>	
Residential Service	5
Small General Service	6
Large General Service	6.1
Interruptible Service with An Assurance Gas Option	7
Natural Gas Transportation Service	10
Alternative Fuels -- Interruptible Service	17
Alternative Fuels -- Transportation Service	18
Special Contract Rates -- Transportation Service	18.1
<u>Miscellaneous Charges</u>	19
<u>Riders</u>	21
<u>Rules and Regulations</u>	36

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RESIDENTIAL SERVICE RATE

Applicable to gas service to all residential customers as defined in Section I.H. of Company's Rules and Regulations. As indicated in Section IX., Resale of Service of Company's Rules and Regulations, this service may not be resold.

- * 1. Monthly Customer and Volumetric Meter Reading Rates.
- | | |
|------------------|-------------------|
| Customer Charge: | \$20.50 per month |
| Delivery Charge: | 29.49¢ per Ccf |
2. Minimum Monthly Charge. The Customer Charge.
3. Purchased Gas Adjustment. Applicable to all metered and/or billed Ccf, pursuant to the provisions of Rider A - Purchased Gas Adjustment Clause.
4. Yard Light Service. Any customer with an unmetered gas yard light will have 18 Ccf per month of gas added per light to each month's metered Ccf usage, for billing purposes. This unmetered yard light service is one of limited application. No new such unmetered service will be offered after February 18, 1998.
5. Seasonal Use. This schedule is a continuous service schedule. If service is disconnected at the request of the customer, and thereafter restored at the same location for the same occupant(s) within a twelve (12) month period following the date of the service disconnection, a reconnection charge will become due and payable when service is restored. The charge shall be computed by multiplying the Customer Charge by the number of months and fractions of months that service is disconnected, plus the Reconnection Charge as indicated in Section D. Miscellaneous Charges, Sheet No. 19. Customer shall not be billed the Customer Charge portion of Seasonal Use charge where a successor account for a Customer has been established at the premises during the interim period; however, the Reconnection Charge shall be applicable unless the premises was not subject to disconnection and reconnection during the entire interim period.
6. Payments. Bills will be rendered at monthly intervals, are due and payable within ten (10) days from their date of rendition and become delinquent after twenty-one (21) days from their date of rendition. The date of rendition is the date of mailing by the Company. Late payment charges shall be determined pursuant to Section VIII.F. of Company's Rules and Regulations.

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

*SMALL GENERAL SERVICE RATE

Applicable to gas service to non-residential customers having an installed capacity of less than 650 cubic feet per hour (cfh) of gas use at low pressure of one quarter (1/4) pounds per square inch (psi). As indicated in Section IX., Resale of Service of Company's Rules and Regulations, this service may not be resold.

1. Monthly Customer and Volumetric Meter Reading Rates.

Customer Charge \$28.00 per month

Delivery Charge 32.48¢ per Ccf

2. Minimum Monthly Charge. The Customer Charge.

3. Purchased Gas Adjustment.

Applicable to all metered and/or billed Ccf, pursuant to the provisions of the Rider A - Purchased Gas Adjustment Clause.

4. Payments.

Bills will be rendered at monthly intervals and are due and payable within ten (10) days from their date of mailing and become delinquent after twenty-one (21) days from their date of mailing. Pursuant to Section VIII.F. of Company's Rules and Regulations, any portion of any bill, other than deposit arrears, remaining unpaid after the delinquent date will have a late payment charge added thereto.

5. Term of Contract.

Gas service will be provided under this rate for a period of not less than one (1) year.

6. Tax Adjustment.

Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

7. Rules and Regulations. Service will be rendered in accordance

with the Company's Rules and Regulations for Gas Service on file with the Missouri Public Service Commission.

* Indicates Addition.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

LARGE GENERAL SERVICE RATE

* Applicable to gas service to non-residential customers having an installed capacity greater than or equal to 650 cubic feet per hour (cfh) of gas use at low pressure of one quarter (1/4) pounds per square inch (psi). As indicated in Section IX., Resale of Service of Company's Rules and Regulations, this service may not be resold.

* 1. Monthly Customer and Volumetric Meter Reading Rates.

Customer Charge	\$48.00	per month
Delivery Charge		
First 7,000 Ccf	28.52¢	per Ccf
Over 7,000 Ccf	26.23¢	per Ccf

2. Minimum Monthly Charge. The Customer Charge.

3. Purchased Gas Adjustment.

Applicable to all metered and/or billed Ccf, pursuant to the provisions of the Rider A - Purchased Gas Adjustment Clause.

* 4. Payments.

Bills will be rendered at monthly intervals and are due and payable within ten (10) days from their date of mailing and become delinquent after twenty-one (21) days from their date of mailing. Pursuant to Section VIII.F. of Company's Rules and Regulations, any portion of any bill, other than deposit arrears, remaining unpaid after the delinquent date will have a late payment charge added thereto.

5. Term of Contract.

Gas service will be provided under this rate for a period of not less than one (1) year.

6. Tax Adjustment.

Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

7. Rules and Regulations.

Service will be rendered in accordance with the Company's Rules and Regulations for Gas Service on file with the Missouri Public Service Commission.

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

INTERRUPTIBLE SERVICE RATE WITH AN ASSURANCE GAS OPTION

1. Availability.

Whenever, in Company's sole judgment, gas is available for interruptible service, Company will make such service available to any qualified non-residential customer. To qualify, customer shall either provide adequate standby facilities and fuel for its use during periods when gas service is interrupted or shall give Company satisfactory evidence of its ability and willingness to curtail or cease operations during interruption. Gas service under other rates cannot be used for the same process, facility or equipment served under this rate. As indicated in Section IX. Resale of Service of Company's Rules and Regulations, this service may not be resold.

2. Character of Service.

All gas delivery under this rate will be subject to interruption under Section 9. hereof and all gas consumed by customer during periods of non-interruption will be billed at the Interruptible Gas Delivery Charge, except for Assurance volumes as provided below. As a part of the contract for interruptible service, customer may request the Company to provide a specified daily quantity of firm sales gas to be available during periods of interruption, to be categorized as Assurance Gas and billed by Company at the Interruptible Gas Delivery Charge plus the Assurance Gas Surcharge and the firm Purchased Gas Adjustment (PGA) factor rate. For billing purposes Assurance Gas volumes shall be considered the first through the meter. Customer will be required to contract with Company, by June 1 of the initial contract year, for the daily quantity of Assurance Gas desired. Customer must notify Company of any changes in such Assurance Gas Level by June 1 of subsequent contract extension years. All other gas consumed by customer during any period of interruption shall be considered and billed by Company as Unauthorized Gas.

* 3. Monthly Customer and Volumetric Meter Reading Rates.

Customer Charge:	\$280.00	per month
Interruptible Gas Delivery Charge:		
First 7,000 Ccf	28.52¢	Per Ccf
Over 7,000 Ccf	14.26¢	Per Ccf
Assurance Gas Surcharge:		
First 250 Ccf per day	1.00¢	Per Ccf
All Over 250 Ccf per day	1.38¢	Per Ccf

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

INTERRUPTIBLE SERVICE RATE WITH AN ASSURANCE GAS OPTION

- * 6. Payments.
Bills will be rendered at monthly intervals and are due and payable within ten (10) days from their date of mailing and become delinquent after twenty-one (21) days from their date of mailing. Pursuant to Section VIII.F. of Company's Rules and Regulations, any portion of any bill, other than deposit arrears, remaining unpaid after the delinquent date will have a late payment charge added thereto.
7. Term of Contract.
Gas will be provided under this rate for a term of not less than one (1) year. Said term shall continue on a year-to-year basis thereafter unless cancelled by either customer or Company in writing at least sixty (60) days prior to contract termination.
8. Tax Adjustment.
Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.
9. Rate Application.
Gas delivery under this rate shall be interrupted when in the Company's sole judgment it is necessary to limit the Company's system sendout or when the gas supply is limited by other system operating restrictions. Any interruption of service will be performed in accordance with the Curtailment of Service Schedule contained in the Company's Rules and Regulations.
- Assurance Gas will be billed by Company during all months of the year as the first gas through the meter up to the Assurance Gas level. All additional gas consumed each day shall be considered as Interruptible Gas during non-interruptible periods and as Unauthorized Gas during periods of interruption.

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

NATURAL GAS TRANSPORTATION SERVICE

1. Availability.

This service schedule is available: 1) to all non-residential customers on a per meter basis and 2) to the premises of "Eligible School Entities," which are the eligible school entities as defined in Section 393.310 RSMo, 3) to the premises of eligible school entities as defined in Section 393.310 RSMo which were on sales service during the immediately preceding twelve (12) months ("New Eligible School Entities"). Such service is applicable to individual customers that can individually secure and arrange for the delivery of sufficient supplies of natural gas to the Company's designated city gate and to the Eligible School Entities and New Eligible School Entities that can do so through aggregate contracts negotiated by and through a not-for-profit school association. The Company will not provide this service to any customer who uses such gas primarily to heat premises that provides temporary or permanent living quarters for individuals, unless the customer demonstrates to the Company that it has contracted for primary firm capacity with the upstream supplying intrastate and/or interstate pipelines to meet the customer's peak needs, or unless the customer demonstrates to the Company that the customer has adequate and usable alternative fuel facilities to meet the customer's energy needs.

The "transportation customer" shall be responsible for the purchase and transportation of its gas needs to the Company's city gate which serves such customer.

The Company shall not sell gas to any of its transportation customers except as specifically provided for in this service classification.

*2. Monthly Customer, EGM and Volumetric Meter Reading Rates. (5)

	Standard		Large Volume(3)
	Small(1)	Large(2)	
Customer Charge - per month:	\$28.00	\$48.00	\$1,205.00
Transportation Charge - per Ccf:	26.81¢		
First 7,000 Ccf		28.52¢	28.52¢
All Over 7,000 Ccf		14.09¢	13.39¢
Electronic Gas Meter (EGM) Charges (4):			
Administrative Charge - per month:	\$40.00	\$40.00	\$40.00
Meter Equipment Charge:	Section G. Miscellaneous Charges Sheet No. 20.1 as applicable.		
Aggregation and Balancing Charge - per Ccf:			
Eligible School Entities and New Eligible School Entities Only	0.40¢	0.40¢	0.40¢

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

NATURAL GAS TRANSPORTATION SERVICE

- * (1) A non-residential customer, at the date of its contract, whose annual transportation requirements are expected to be 600,000 Ccf or less and whose installed capacity is less than 650 cubic feet per hour (cfh) of gas use at low pressure of one quarter (1/4) pounds per square inch (psi).
- * (2) A non-residential customer, at the date of its contract, whose annual transportation requirements are expected to be 600,000 Ccf or less and whose installed capacity is greater than or equal to 650 cfh of gas use at low pressure of one quarter (1/4) psi.
- ** (3) A customer, at the date of its contract, whose annual transportation requirements are expected to be greater than 600,000 Ccf.
- ** (4) Not applicable, to the individual meters of Eligible School Entities, and New Eligible School Entities as defined in paragraph 1. above, using less than one hundred thousand Ccfs annually.
- ** (5) In addition to the charges contained herein all Eligible School Entities and New Eligible School Entities shall pay all costs necessary to ensure that the Company, its other customers and local taxing authorities will not have or incur any negative financial impact as a result of the natural gas aggregation program established by Section 393.310, RSMo.

Authorized Gas Use Charge:

All Ccf of Company-owned gas consumed by customer with authorization from Company during periods of non-interruption of any sales service will be billed at the applicable service area's firm sales service Purchased Gas Adjustment (PGA) factor plus 40%. The payment of the Authorized Gas Use Charge will be in addition to the above Customer, EGM and Transportation Charges. Company will not actively market the sale of Company-owned gas to transportation customers and will sell such gas only in response to the transportation customer's request. Authorized Use gas shall not be available to a transportation customer for more than twenty (20) days out of any calendar month.

Unauthorized Gas Use Charge:

All Ccf of Company-owned gas consumed by customer without authorization from Company, will be billed at the "Unauthorized Gas Use Charge". This charge shall be applicable to customers that are impacted by Critical Day and/or curtailment provisions. Company will provide Customer no less than two (2) hours advance notification before assessing Unauthorized Gas Use Charges. The payment of the Unauthorized Gas Use Charge will be in addition to all other charges specified in this rate. Regardless of the assessment of the Unauthorized Gas Use Charge, the Company retains the right to terminate such unauthorized use by disconnecting the customer's service if necessary to protect the reliability of service to other customers. Unauthorized Gas Use Charges shall be billed as follows:

- * Indicates Change.
- ** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

NATURAL GAS TRANSPORTATION SERVICE

Unauthorized Gas Use Charge:

- 1) \$6.00 (six dollars) for each Ccf of unauthorized use, plus
- 2) 150% (one hundred fifty percent) of the highest cost of gas purchased by the Company during the Unauthorized Gas Use Charge Period, plus
- 3) all intrastate and/or interstate pipeline penalties and other charges incurred by the Company which are attributable to a customer's unauthorized use.

All intrastate and interstate pipeline penalties and other charges shall be attributed and assigned to the unauthorized gas used by the specific transportation customer.

All Unauthorized Gas Use Charge revenues billed to customers will be considered as gas cost recovery and will be used in the development of the Actual Cost Adjustment (ACA) factor of the Company's Purchased Gas Adjustment (PGA) Clause.

3. Minimum Monthly Charge. The Customer Charge, EGM Administrative Charge and, as applicable, the EGM Meter Equipment Charge.
4. Purchased Gas Adjustment. All customers receiving transportation service will be subject to the provisions of the Company's PGA clause, Rider A. The ACA component of the Company's PGA clause shall be applicable to New Eligible School Entities for the first twelve (12) months of their participation in the gas aggregation program.
- * 5. Payments. Bills will be rendered at monthly intervals and are due and payable within ten (10) days from their date of mailing and become delinquent after twenty-one (21) days from their date of mailing. Pursuant to Section VIII.F. of Company's Rules and Regulations, any portion of any bill, other than deposit arrears, remaining unpaid after the delinquent date will have a late payment charge added thereto.
6. Term of Contract. Service hereunder shall be for a minimum period of one (1) year.

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

NATURAL GAS TRANSPORTATION SERVICE

7. Tax Adjustment.
Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to the customers under the jurisdiction of the taxing authority. For New Eligible School Entities participating in aggregate purchasing contracts, all applicable taxes shall be computed based on billed revenues determined under paragraph 2. above. Additional applicable taxes shall also be levied and computed based upon the total actual gas supply and capacity release costs incurred on behalf of each of the accounts within the group of individual New Eligible School Entities. Such additional taxes applicable to the latter accounts will be paid each month directly to the appropriate taxing authority by each school or by the school's agent.
8. Terms and Conditions.
- A. Transportation service under this schedule will be made available to customers upon request when the Company has sufficient distribution capacity to supply such service. If the Company determines that it does not have sufficient distribution capacity to provide the requested service it will, within 30 days of receiving a request for transportation service, provide to the customer requesting said service a written explanation of its capacity determination including a preliminary indication of changes to facilities necessary to effectuate such service, approximate cost to customer and time required to provide the requested service.
- * B. Service under this schedule shall require execution of a Gas Transportation Service Contract ("Contract") between the Company and the customer requesting transportation service.
- C. Service will be provided only after requisite contracts and authority have been obtained by the customer to transport gas to the Company's facilities. Eligible School Entities or New Eligible School Entities participating in the school natural gas aggregation program must make a written request for pipeline capacity release to the Company on or before close of business May 31, to be effective July 1, of each year, except where said entities have switched from Standard Transportation Service. The Company will release its firm interstate pipeline transportation capacity, at its actual capacity cost, from the applicable interstate pipeline directly to the school or to the agent acting on behalf of the school for this program. Such release will be for a minimum term of one year and will be performed in accordance with the capacity release procedures and policies contained in the applicable interstate pipeline's Federal Energy Regulatory Commission approved tariff. Such release will be provided on a recallable basis, but the Company will not recall such capacity unless requested by the school or by the school's agent.

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

* BLANK SHEET
(Reserved For Future Use)

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

* BLANK SHEET
(Reserved For Future Use)

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

* BLANK SHEET
(Reserved For Future Use)

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

* BLANK SHEET
(Reserved For Future Use)

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

* BLANK SHEET
(Reserved For Future Use)

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

TABLE OF CONTENTS

RIDERS

		<u>SHEET NO.</u>
* <u>RIDER</u>		
A	Purchased Gas Adjustment Clause	22
ISRS	Infrastructure Replacement Surcharge	34

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

*** APPLICABILITY**

The Purchased Gas Adjustment (PGA) Clause applies to all sales and transportation services provided under all natural gas rate schedules and contracts, including sales to transportation customers. Effective XXXXXXX X, XXXX the Company will consolidate and implement a single PGA for all of the Company's service areas. For purposes of this clause, the term "cost of gas" shall be as defined under Section I.B.

Any increase or decrease in the PGA factor, including the Actual Cost Adjustment (ACA) factor, resulting from the application of this Rider A, shall be applied prorata to customers' bills for service rendered on and after the effective date of the change. Bills which contain multiple PGA rate changes, including the ACA component of such rate changes, during a customer's billing period shall be prorated between the old and new rates in proportion to the number of days in the customer's billing period that such rates were in effect.

I. PURCHASED GAS COST ADJUSTMENT

A. Filing of the PGA

The Company shall be allowed to make up to four (4) PGA filings during each calendar year. One such filing will be effective in November of each year, but no more than one PGA filing shall become effective in any two consecutive calendar months unless specifically ordered by the Commission. Such PGA filings shall be made at least ten (10) business days prior to their effective dates.

All PGA filings shall be accompanied by detailed work-papers supporting the filing in an electronic format. Sufficient detail shall be provided so the level of hedging that is used to develop the gas supply commodity charge for the PGA factor can be determined.

B. Contents of PGA Filings - When proposing revisions to its filed PGA factors, the Company shall file PGA tariff sheets with the Commission for approval which consist of:

** The Regular Purchased Gas Adjustment (RPGA) Factor - A ¢/Ccf factor to reflect the current estimate of the annualized cost of various natural gas services purchased by the Company, including but not limited to firm and interruptible gas supply, gathering services, firm and interruptible transportation service, storage services, gas price volatility mitigation instruments, including but not limited to, financial instruments, and any service which bundles or aggregates these various services.

* Indicates Change.
** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

The Actual Cost Adjustment (ACA) Factor - A ¢/Ccf factor to reflect the annual reconciliation of actual purchased gas and pipeline service costs with the actual recovery of such costs through the application of this Rider A. Revised ACA factors shall be filed with the PGA filing to be effective in November of each year.

In addition, in any PGA filing, the Company may include a rate adjustment, hereinafter referred to as the "PGA Filing Adjustment Factor (FAF)", not to exceed five cents (5.0¢) per Ccf which is designed to refund to, or recover from customers any over or under recoveries of gas costs that have accumulated since the Company's last ACA filing.

For the purpose of the computations herein, the cost of gas recoverable through the RPGA and ACA shall include:

- a) The cost of any liquid or gaseous hydrocarbons purchased for injection into the gas stream;
- b) Gathering, transportation and storage costs related to such liquid or gaseous hydrocarbons;
- c) Costs associated with mitigating price volatility in the Company's gas supply portfolio, including but not limited to, financial instruments; and
- d) All other costs associated with the purchase, transportation and/or storage of natural gas under a rate, tariff or contract subject to regulation by the Federal Energy Regulatory Commission (FERC) or successor agency including, but not limited to, costs billed as take-or-pay and transition charges.

As used in this Rider, the following definitions shall apply:

- "filing month" - the month in which a RPGA or ACA is determined by the Company and filed with the Commission;
- "base period" - the first twelve (12) of the thirteen (13) months immediately preceding the filing month;
- * "firm sales" - the sales associated with the Company's Residential, General Service, and Interruptible (Assurance Gas) rate classifications;

*Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

II. DETERMINATION OF REGULAR PURCHASED GAS ADJUSTMENT (RPGA)

The RPGA will be determined in accordance with the following:

*A. Commodity-Related Charges

The commodity-related charges shall include but not be limited to producer gas supply commodity charges, pipeline transmission and gathering commodity charges, expected costs or cost reductions to be realized for the entire applicable period, storage withdrawals, gas purchases under fixed-price contracts, and the Company's cost of gas price volatility mitigation instruments, including but not limited to, financial instruments, except for call options for which only cost reductions expected to be realized during the months covered by the Company's PGA filing shall be reflected. A commodity-related per unit ¢/Ccf factor shall be determined by dividing commodity-related costs by total sales volumes during the base period.

B. Demand-Related (Capacity, Reservation, Space, Deliverability) Charges

For the purpose of the computations herein "demand-related" shall mean gas costs relating to fixed pipeline transportation and storage charges, fixed gas supply charges, and other FERC-authorized fixed charges.

1. Purchased Gas

For each natural gas supply purchased during the base period multiply the number of units of demand purchased during the base period by their respective charge(s) in effect on the first day of the filing month and divide by firm sales volumes during the base period.

** 2. Supplemental Gas

For each supplemental (temporary and emergency) gas supply purchased during the base period multiply the number of units purchased each month of the base period by the charge(s) in effect on the first day of the filing month and divide by firm sales volumes during the base period; in the case of a supply initially accounted for as an inventory item, multiply the number of units taken from inventory each month of the base period by the most current inventory unit price for such supply and divide by firm sales volumes during the base period.

* Indicates Change.
** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

3. Purchased Seasonal/Peaking Storage

For each seasonal/peaking type storage service purchased during the base period multiply the units of demand purchased during the base period by their respective charge(s) in effect on the first day of the filing month and divide by firm sales volumes during the base period; if there is no purchase of a specific storage service for the filing month, the last charge(s) paid for such storage service purchased in the base period shall be used.

4. Purchased Balancing Storage

For each balancing type storage service purchased during the base period multiply the units of demand purchased during the base period by their respective charge(s) in effect on the first day of the filing month and divide by total sales volumes during the base period; if there is no purchase of a specific storage service for the filing month, the last charge(s) paid for such storage service purchased in the base period shall be used.

* 5. Transportation Service

For each separate related transportation service purchased during the base period multiply the number of units of demand purchased during the base period by their respective charge(s) in effect on the first day of the filing month, less 1.25¢ per Ccf times the units of interruptible sales, and divide the resulting balance of demand costs by firm sales volumes during the base period; if there is no purchase of a specific transportation service for the filing month, the last charge(s) paid for such transportation service purchased during the base period shall be used.

** C. Other Costs of Gas

The total amounts of any costs, different from those referred to above, associated with the supply, transportation and/or storage service of natural gas during the base period under a rate, tariff or contract subject to regulation by the FERC or successor agency, divided by total sales and/or transported volumes, as applicable, during the base period. These costs include, but are not limited to, costs billed as take-or-pay and transition charges.

* Indicates Change.
** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

D. Determination of Class RPGA Factors

The RPGA factor for the firm sales rate classifications of natural gas service shall be calculated by summing the factors determined in Sections II.A. through II.C. above.

The RPGA factor for the interruptible sales rate classification of natural gas service shall be calculated by summing the factors determined in Sections II.A., II.B.4., and II.C. above plus 1.25¢ per Ccf.

The RPGA factor for the transportation rate classification shall be as calculated in Section II.C. above.

III. ACTUAL COST ADJUSTMENT (ACA) ACCOUNT:

* An ACA account shall be maintained for the Company's service area. Said account shall be credited by the amount of any gas costs recovered through the action of this Rider in excess of actual gas costs incurred by the Company, and debited by the amount of any such recovered gas costs which is less than actual gas costs incurred by the Company. Such reconciliation of gas costs incurred and recovered shall be for the twelve (12) month period ending with August of each year, as defined herein.

Such excess or deficiency in total gas cost recovery for each sales rate classification and transportation rate classification shall be determined by a monthly comparison of the actual cost of gas for each month, including the prior period's ACA balance to the gas cost revenues recovered for the corresponding revenue month.

1. Demand-related costs applicable to "Purchased Gas" supply service, "Purchased Seasonal/Peaking Storage" service, "Supplemental Gas" service and "Transportation" of peaking storage service shall be allocated to the firm sales rate classifications.
- *2. Demand-related costs applicable to pipeline "Transportation" service and "Purchased Balancing Storage" service shall be allocated to firm sales and interruptible sales rate classifications. The interruptible sales customers will be allocated a portion of such "Transportation" demand costs. The balance of demand costs will then be allocated to the firm sales rate classification.

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

- * 3. Commodity-related costs applicable to "Purchased Gas" supply service, "Purchased Seasonal/Peaking Storage" service, "Purchased Balancing Storage" service and "Transportation" service shall be allocated to each sales rate classification based on the ratio of each such classes' respective actual sales to the sum of total sales for the related revenue month.
- ** 4. "Other Cost of Gas" incurred shall be allocated as applicable to each sales rate classification and transportation rate classification based on the ratio of each such classes' respective actual sales and transported volumes to the sum of such sales and transported volumes for the related revenue month.
- ** 5. Any refunds which the Company receives in connection with natural gas services purchased, together with any interest included in such refunds, will be refunded to the Company's applicable customers unless otherwise ordered by the Commission. Such refunds shall be credited to the ACA account in the month received and shall be a part of the overall ACA interest calculation.
- The refund amount will be allocated to each firm sales, interruptible sales and transportation rate classification based upon the same allocation of such costs as calculated during the base period in Section II. herein.
- ** 6. The total gas cost recovered each month shall be equal to the product of the billed Ccf of each rate classification times the sum of the applicable RPGA and ACA factors plus Rider B amounts. The RPGA factor will include, if applicable, the FAF factor.
- * 7. For the ACA period ending with August of each year, the aggregate excess or deficiency in gas cost recovery as described above shall be accumulated to produce a cumulative balance of excess or deficiency of gas cost recovery by sales and transportation rate classifications. ACA factors shall be computed by dividing these cumulative balances by the estimated sales and transportation volumes during the subsequent twelve-month billing period of November - October, for each of the sales and transportation rate classifications. All actual ACA revenue recovered shall be debited or credited to the appropriate monthly balance of the ACA account.

* Indicates Change.
** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

- ** 8. For each month during the ACA period and for each month thereafter interest, at a simple rate equal to the prime bank lending rate (as published in the Wall Street Journal on the first business day of the following month), minus two (2) percentage points (but not less than zero) shall be credited to customers for any over-recovery of gas costs or credited to the Company for any under-recovery of gas costs. Interest shall be computed based upon the average of the accumulated beginning and ending monthly ACA account balances. The Company shall maintain detailed work-papers that provide the interest calculation on a monthly basis.
- * 9. These ACA factors shall be rounded to the nearest 0.01¢/Ccf and applied to billings of each applicable sales and transportation rate classification, commencing in November of each year, and shall remain in effect until superseded by subsequent ACA factors calculated according to this provision.
- **10. The Company concurrently with its annual ACA filing, shall:
- (a) Provide all documentation necessary to reconcile the Company's actual gas costs with its billed revenue. Provide all documentation of all natural gas purchases (commodity, demand or reservation charges or other charges) to support that the claimed costs are properly attributed to the ACA period and that the pipelines, natural gas suppliers, and any other vendors have charged or invoiced the Company for the volumes nominated and received at the proper rates.
 - (b) Provide all documentation to support decisions made at the time of the Company's natural gas supply planning, capacity planning, purchasing practices, and operating decisions for the ACA period.
 - (c) Provide documentation of the financial impact on customers of the Company's decisions regarding its gas supply, transportation and storage contracts.
 - (d) Provide copies of all contracts in effect at any time during the ACA period. Include copies of all contracts related to the procurement of natural gas including but not limited to transportation, storage, and supply contracts and all schedules and exhibits and letter agreements related to gas procurement, gas costs and/or gas constraints.

* Indicates Change.
** Indicates Reissue.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

* (e) The documentation provided shall include fully functioning electronic spreadsheets. The term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed electronic or written materials of every kind in Company's possession, custody or control or within Company's knowledge.

****IV. GAS SUPPLY INCENTIVE PLAN**

This Section IV establishes a Gas Supply Incentive Plan ("GSIP") mechanism whereby the Company and its customers share in specified savings and revenues realized by the Company in utilizing and managing its system gas supply assets.

The GSIP is designed to provide the Company with incentives to maximize revenues generated from the management and utilization of upstream pipeline transportation or storage capacity assets.

The Company shall maintain a separate Incentive Revenue ("IR") Account to record that portion of revenue retained by the Company in connection with the following provisions of the GSIP.

A. Capacity Release Revenues. The Company shall credit its ACA Account for the difference between the total revenues it realizes from the release of upstream pipeline transportation or upstream storage capacity to another party and that portion of such revenues which the Company shall retain in the IR Accounts according to the following percentages:

Annual Capacity Release Credits	Company Retention Percentage	Firm Sales Customer Percentage
First \$75,000	15%	85%
Next \$75,000	20%	80%
Next \$75,000	25%	75%
Amounts Over \$225,000	30%	70%

B. Other Provisions

1. The GSIP shall be effective July 11, 2010.

* Indicates Reissue.
 ** Indicates Addition.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER A
PURCHASED GAS ADJUSTMENT CLAUSE

*PGA Statement

Effective XXXXXXXX X, XXXX the Company will consolidate and implement a single PGA for all of the Company's service areas. The PGAs (in ¢/Ccf) to be applied to the Company's basic rate schedules on and after the effective date of this tariff, are as follows:

	<u>Firm Sales</u>	<u>Interruptible Sales</u>	<u>Transportation Service</u>
<u>RPGA:</u>	xx.xx¢/Ccf	xx.xx¢/Ccf	0.00¢/Ccf
<u>ACA:</u>	<u>xx.xx¢/Ccf</u>	<u>xx.xx¢/Ccf</u>	<u>0.00¢/Ccf</u>
TOTAL PGA	<u>xx.xx¢/Ccf</u>	<u>xx.xx¢/Ccf</u>	<u>0.00¢/Ccf</u>

*Indicates Addition.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri

Name of Officer
Title
Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

*BLANK SHEET
(Reserved For Future Use)

* Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
Name of Officer Title Address

UNION ELECTRIC COMPANY GAS SERVICE

Applying to MISSOURI SERVICE AREA

RIDER ISRS

INFRASTRUCTURE SYSTEM REPLACEMENT SURCHARGE

Description:

The ISRS is designed to recover the costs associated with the Company's eligible infrastructure replacements in accordance with the provisions of Sections 393.1009 to 393.1015, RSMo.

Applicability:

In addition to the other charges provided for in the Company's tariff, a monthly ISRS shall be added to each customer's bill for service rendered on and after the effective date of the ISRS.

Schedule of Surcharges:

The amount of the ISRS by rate schedule is as follows:

	<u>*Per Bill Per Month</u>
Residential Service Rate	\$0.00
General Service Rate	\$0.00
Interruptible Service Rate With An Assurance Gas Option	\$0.00
Natural Gas Transportation Rate - Standard	\$0.00
Natural Gas Transportation Rate - Large Volume	\$0.00
Alternative Fuels - Interruptible Service	\$0.00
Alternative Fuels - Transportation Service (Standard)	\$0.00
Alternative Fuels - Transportation Service (Large Volume)	\$0.00

*Indicates Change.

DATE OF ISSUE June 11, 2010 DATE EFFECTIVE July 11, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri

Name of Officer
Title
Address

AMERENUE
SUMMARY OF PROPOSED MISSOURI GAS RATE REVISIONS
TEST YEAR 12 MONTHS ENDED DECEMBER 2009

	Annual Bills	Ccf	Revenue ¹			
			Present	Proposed	Change	%
Residential	1,354,778	74,021,361	\$ 99,735,324	\$ 109,559,141	\$ 9,823,818	9.8%
Small General	118,328	9,809,902	\$ 13,736,602	\$ 14,445,448	\$ 708,846	5.2%
Large General	40,857	30,839,645	\$ 34,332,499	\$ 35,672,214	\$ 1,339,715	3.9%
Interruptible	204	5,092,082	\$ 4,401,599	\$ 4,401,729	\$ 129	0.0%
Transportation						
Standard Small	407	87,020	\$ 97,733	\$ 97,729	\$ (4)	0.0%
Standard Large	3,163	17,063,687	\$ 16,065,501	\$ 16,065,773	\$ 272	0.0%
Large Volume	<u>213</u>	<u>22,071,586</u>	<u>\$ 19,334,504</u>	<u>\$ 19,335,501</u>	<u>\$ 996</u>	<u>0.0%</u>
Subtotal	1,517,949	158,985,283	\$ 187,703,763	\$ 199,577,535	\$ 11,873,772	6.3%
Special Contracts	72	5,597,295	\$ 814,433	\$ 814,433	\$ -	0.0%
Other Revenues	<u>NA</u>	<u>NA</u>	<u>\$ 2,201,663</u>	<u>\$ 2,201,663</u>	<u>\$ -</u>	<u>0.0%</u>
Total ⁽²⁾	<u>1,518,021</u>	<u>164,582,578</u>	<u>\$ 190,719,859</u>	<u>\$ 202,593,631</u>	<u>\$ 11,873,772</u>	<u>6.2%</u>

(1) Includes a weighted average PGA factor of 81.00¢/Ccf and 68.00¢/Ccf for Firm and Interruptible Service, respectively, and an assumed 72.00¢/Ccf gas for Transportation Service.

(2) Increase excluding assumed transportation customer's cost of gas is 7.3%

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

RESIDENTIAL

<u>Ccf</u>	<u>Proposed *</u>
10	\$31.55
20	\$42.60
30	\$53.65
40	\$64.70
50	\$75.75
60	\$86.79
70	\$97.84
80	\$108.89
90	\$119.94
100	\$130.99
110	\$142.04
120	\$153.09
130	\$164.14
140	\$175.19
150	\$186.24
160	\$197.28
170	\$208.33
180	\$219.38
190	\$230.43
200	\$241.48
210	\$252.53
220	\$263.58
230	\$274.63
240	\$285.68
250	\$296.73
260	\$307.77
270	\$318.82
280	\$329.87
290	\$340.92
300	\$351.97

* Includes an average monthly PGA of 81¢/Ccf and excludes taxes

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

SMALL GENERAL SERVICE

<u>Ccf</u>	<u>Proposed *</u>
50	\$84.74
100	\$141.48
150	\$198.22
200	\$254.96
250	\$311.70
300	\$368.44
350	\$425.18
400	\$481.92
450	\$538.66
500	\$595.40
1,000	\$1,162.80
1,500	\$1,730.20
2,000	\$2,297.60
2,500	\$2,865.00
3,000	\$3,432.40
3,500	\$3,999.80
4,000	\$4,567.20
4,500	\$5,134.60
5,000	\$5,702.00
5,500	\$6,269.40
6,000	\$6,836.80
6,500	\$7,404.20
7,000	\$7,971.60
7,500	\$8,539.00
8,000	\$9,106.40
8,500	\$9,673.80
9,000	\$10,241.20
9,500	\$10,808.60
10,000	\$11,376.00
15,000	\$17,050.00
20,000	\$22,724.00
25,000	\$28,398.00

* Includes an average monthly PGA of 81¢/Ccf and excludes taxes

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

LARGE GENERAL SERVICE

<u>Ccf</u>	<u>Proposed *</u>
50	\$102.76
100	\$157.52
150	\$212.28
200	\$267.04
250	\$321.80
300	\$376.56
350	\$431.32
400	\$486.08
450	\$540.84
500	\$595.60
1,000	\$1,143.20
1,500	\$1,690.80
2,000	\$2,238.40
2,500	\$2,786.00
3,000	\$3,333.60
3,500	\$3,881.20
4,000	\$4,428.80
4,500	\$4,976.40
5,000	\$5,524.00
5,500	\$6,071.60
6,000	\$6,619.20
6,500	\$7,166.80
7,000	\$7,714.40
7,500	\$8,250.55
8,000	\$8,786.70
8,500	\$9,322.85
9,000	\$9,859.00
9,500	\$10,395.15
10,000	\$10,931.30
15,000	\$16,292.80
20,000	\$21,654.30
25,000	\$27,015.80

* Includes an average monthly PGA of 81¢/Ccf and excludes taxes

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

INTERRUPTIBLE SERVICE

<u>Ccf</u>	<u>Proposed *</u>
1,000	\$1,245.20
2,000	\$2,210.40
3,000	\$3,175.60
4,000	\$4,140.80
5,000	\$5,106.00
6,000	\$6,071.20
7,000	\$7,036.40
8,000	\$7,859.00
9,000	\$8,681.60
10,000	\$9,504.20
12,500	\$11,560.70
15,000	\$13,617.20
17,500	\$15,673.70
20,000	\$17,730.20
22,500	\$19,786.70
25,000	\$21,843.20
27,500	\$23,899.70
30,000	\$25,956.20
35,000	\$30,069.20
40,000	\$34,182.20
45,000	\$38,295.20
50,000	\$42,408.20
55,000	\$46,521.20
60,000	\$50,634.20
65,000	\$54,747.20
70,000	\$58,860.20
75,000	\$62,973.20
80,000	\$67,086.20
85,000	\$71,199.20
90,000	\$75,312.20
95,000	\$79,425.20
100,000	\$83,538.20

* Includes an average monthly PGA of 68¢/Ccf and excludes taxes

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

STANDARD SMALL TRANSPORTATION SERVICE

<u>Ccf</u>	Proposed *	
	Non-Elligible Schools	Eligible Schools
500	\$583.05	\$524.05
1,000	\$1,077.10	\$1,020.10
1,500	\$1,571.15	\$1,516.15
2,000	\$2,065.20	\$2,012.20
2,500	\$2,559.25	\$2,508.25
3,000	\$3,053.30	\$3,004.30
3,500	\$3,547.35	\$3,500.35
4,000	\$4,041.40	\$3,996.40
4,500	\$4,535.45	\$4,492.45
5,000	\$5,029.50	\$4,988.50
5,500	\$5,523.55	\$5,484.55
6,000	\$6,017.60	\$5,980.60
6,500	\$6,511.65	\$6,476.65
7,000	\$7,005.70	\$6,972.70
7,500	\$7,499.75	\$7,468.75
8,000	\$7,993.80	\$7,964.80
8,500	\$8,487.85	\$8,460.85
9,000	\$8,981.90	\$8,956.90
9,500	\$9,475.95	\$9,452.95
10,000	\$9,970.00	\$9,949.00
10,500	\$10,464.05	\$10,445.05
11,000	\$10,958.10	\$10,941.10
11,500	\$11,452.15	\$11,437.15
12,000	\$11,946.20	\$11,933.20
12,500	\$12,440.25	\$12,429.25
13,000	\$12,934.30	\$12,925.30
13,500	\$13,428.35	\$13,421.35
14,000	\$13,922.40	\$13,917.40
14,500	\$14,416.45	\$14,413.45
15,000	\$14,910.50	\$14,909.50
15,500	\$15,404.55	\$15,405.55
16,000	\$15,898.60	\$15,901.60

* Includes an assumed average monthly gas cost of 72¢/Ccf and excludes tax

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

STANDARD LARGE TRANSPORTATION SERVICE

<u>Ccf</u>	Proposed *	
	Non-Elligible Schools	Eligible Schools
1,000	\$1,114.20	\$1,057.20
3,000	\$3,124.60	\$3,075.60
5,000	\$5,135.00	\$5,094.00
7,000	\$7,145.40	\$7,112.40
10,000	\$9,728.10	\$9,707.10
15,000	\$14,032.60	\$14,031.60
20,000	\$18,337.10	\$18,356.10
25,000	\$22,641.60	\$22,680.60
30,000	\$26,946.10	\$27,005.10
35,000	\$31,250.60	\$31,329.60
40,000	\$35,555.10	\$35,654.10
45,000	\$39,859.60	\$39,978.60
50,000	\$44,164.10	\$44,303.10
60,000	\$52,773.10	\$52,952.10
70,000	\$61,382.10	\$61,601.10
80,000	\$69,991.10	\$70,250.10
90,000	\$78,600.10	\$78,899.10
100,000	\$87,209.10	\$87,548.10
110,000	\$95,818.10	\$96,197.10
120,000	\$104,427.10	\$104,846.10
130,000	\$113,036.10	\$113,495.10
140,000	\$121,645.10	\$122,144.10
150,000	\$130,254.10	\$130,793.10
160,000	\$138,863.10	\$139,442.10
170,000	\$147,472.10	\$148,091.10
180,000	\$156,081.10	\$156,740.10
190,000	\$164,690.10	\$165,389.10
200,000	\$173,299.10	\$174,038.10
210,000	\$181,908.10	\$182,687.10
220,000	\$190,517.10	\$191,336.10
230,000	\$199,126.10	\$199,985.10
240,000	\$207,735.10	\$208,634.10

* Includes an assumed average monthly gas cost of 72¢/Ccf and excludes taxes

AMERENUE
MISSOURI GAS OPERATIONS
TYPICAL MONTHLY BILL COMPARISON

LARGE VOLUME TRANSPORTATION SERVICE

<u>Ccf</u>	Proposed *	
	Non-Elligible Schools	Eligible Schools
1,000	\$2,271.20	\$2,214.20
3,000	\$4,281.60	\$4,232.60
5,000	\$6,292.00	\$6,251.00
7,000	\$8,302.40	\$8,269.40
10,000	\$10,864.10	\$10,843.10
15,000	\$15,133.60	\$15,132.60
20,000	\$19,403.10	\$19,422.10
25,000	\$23,672.60	\$23,711.60
30,000	\$27,942.10	\$28,001.10
35,000	\$32,211.60	\$32,290.60
40,000	\$36,481.10	\$36,580.10
45,000	\$40,750.60	\$40,869.60
50,000	\$45,020.10	\$45,159.10
60,000	\$53,559.10	\$53,738.10
70,000	\$62,098.10	\$62,317.10
80,000	\$70,637.10	\$70,896.10
90,000	\$79,176.10	\$79,475.10
100,000	\$87,715.10	\$88,054.10
110,000	\$96,254.10	\$96,633.10
120,000	\$104,793.10	\$105,212.10
130,000	\$113,332.10	\$113,791.10
140,000	\$121,871.10	\$122,370.10
150,000	\$130,410.10	\$130,949.10
160,000	\$138,949.10	\$139,528.10
170,000	\$147,488.10	\$148,107.10
180,000	\$156,027.10	\$156,686.10
190,000	\$164,566.10	\$165,265.10
200,000	\$173,105.10	\$173,844.10
210,000	\$181,644.10	\$182,423.10
220,000	\$190,183.10	\$191,002.10
230,000	\$198,722.10	\$199,581.10
240,000	\$207,261.10	\$208,160.10

* Includes an assumed average monthly gas cost of 72¢/Ccf and excludes taxes

AmerenUE
MISSOURI GAS OPERATIONS
CLASS COST OF SERVICE ALLOCATION STUDY
12 MONTHS ENDED DECEMBER 2009

TITLE: COST OF SERVICE SUMMARY (Current Rates)

<u>LINE #</u>	<u>ITEM</u>	<u>TOTAL</u> <u>MISSOURI</u>	<u>RESIDENTIAL</u>	<u>SMALL</u> <u>GENERAL</u>	<u>LARGE</u> <u>GENERAL</u>	<u>INTERRUPTIBLE</u>	<u>TR</u> <u>S</u>
1							
2	<u>COST OF SERVICE SUMMARY</u>						
3							
4	GAS OPERATING REVENUE						
5	Sale of Gas	\$ 63,117,660	\$ 39,778,022	\$ 5,790,581	\$ 9,352,387	\$ 938,983	\$
6	Special Contract Revenues	\$ 814,433	\$ 522,753	\$ 71,995	\$ 134,790	\$ 12,369	\$
7	Other Operating Revenues	\$ 2,201,663	\$ 1,755,244	\$ 175,644	\$ 173,901	\$ 11,684	\$
8							
9	TOTAL GAS OPERATING REVENUES	\$ 66,133,757	\$ 42,056,019	\$ 6,038,220	\$ 9,661,079	\$ 963,036	\$
10							
11	EXPENSES:						
12	Total Gas O&M Expenses	\$ 33,565,959	\$ 24,564,855	\$ 2,736,443	\$ 3,863,442	\$ 298,695	\$
13	Depreciation Expense	\$ 8,686,513	\$ 5,686,767	\$ 819,014	\$ 1,334,690	\$ 104,493	\$
14	Taxes Other than Income Taxes	\$ 7,674,559	\$ 5,047,618	\$ 709,574	\$ 1,155,007	\$ 94,502	\$
15							
16	INCOME TAXES	\$ 7,833,849	\$ 5,101,822	\$ 733,452	\$ 1,202,732	\$ 98,744	\$
17							
18	NET UTILITY OPERATING INCOME	\$ 8,372,877	\$ 1,654,956	\$ 1,039,738	\$ 2,105,209	\$ 366,602	\$
19							
20	RATE BASE	\$ 244,864,059	\$ 157,168,638	\$ 21,645,747	\$ 40,525,472	\$ 3,718,671	\$
21							
22	RATE OF RETURN - REALIZED	3.42	1.05	4.80	5.19	9.86	

AMERENUE
MISSOURI GAS OPERATIONS
SUMMARY OF CLASS COST OF SERVICE RESULTS
12 MONTHS ENDED DECEMBER 2009

	Class Cost of Service Results			
	<u>Current Rates</u>	<u>Equal ROR</u>	<u>Change</u>	<u>%</u>
Residential	\$ 39,778,022	\$ 51,045,758	\$ 11,267,736	28.3%
Small General Service	\$ 5,790,581	\$ 6,499,783	\$ 709,202	12.2%
Large General Service	\$ 9,352,387	\$ 10,692,014	\$ 1,339,627	14.3%
Interruptible	\$ 938,983	\$ 900,105	\$ (38,878)	-4.1%
Standard Transportation	\$ 3,814,725	\$ 2,990,326	\$ (824,399)	-21.6%
Large Volume Transportation	<u>\$ 3,442,962</u>	<u>\$ 2,864,606</u>	<u>\$ (578,356)</u>	<u>-16.8%</u>
Subtotal	\$ 63,117,660	\$ 74,992,593	\$ 11,874,932	18.8%
Special Contract	\$ 814,433	\$ 814,433	\$ -	0.0%
Other Revenues	<u>\$ 2,201,663</u>	<u>\$ 2,201,663</u>	<u>\$ -</u>	<u>0.0%</u>
Total	<u><u>\$ 66,133,757</u></u>	<u><u>\$ 78,008,689</u></u>	<u><u>\$ 11,874,932</u></u>	<u><u>18.0%</u></u>

AMERENUE
MISSOURI GAS OPERATIONS
SUMMARY OF CLASS COST OF SERVICE RESULTS
12 MONTHS ENDED DECEMBER 2009

	Class Cost of Service Results			
	<u>Current Rates</u>	<u>Mitigated</u>	<u>Change</u>	<u>%</u>
Residential	\$ 39,778,022	\$ 49,604,125	\$ 9,826,103	24.7%
Small General Service	\$ 5,790,581	\$ 6,499,783	\$ 709,202	12.2%
Large General Service	\$ 9,352,387	\$ 10,692,014	\$ 1,339,627	14.3%
Interruptible	\$ 938,983	\$ 938,983	\$ -	0.0%
Standard Transportation	\$ 3,814,725	\$ 3,814,725	\$ -	0.0%
Large Volume Transportation	<u>\$ 3,442,962</u>	<u>\$ 3,442,962</u>	<u>\$ -</u>	0.0%
Subtotal	\$ 63,117,660	\$ 74,992,593	\$ 11,874,932	18.8%
Special Contract	\$ 814,433	\$ 814,433	\$ -	0.0%
Other Revenues	<u>\$ 2,201,663</u>	<u>\$ 2,201,663</u>	<u>\$ -</u>	0.0%
Total	<u><u>\$ 66,133,757</u></u>	<u><u>\$ 78,008,689</u></u>	<u><u>\$ 11,874,932</u></u>	18.0%