

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Proposed Rulemaking to)	
Implement the Consumer Clean Energy Act,)	<u>Case No. EX-2003-0230</u>
Section 386.887, RSMo Supp. 2002)	

INITIAL COMMENTS OF AMERENUE
IN SUPPORT OF THE PROPOSED RULE

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”), and submits its Initial Comments in Support of the Proposed Rule. In support of these comments, AmerenUE states the following:

1. Union Electric Company is a Missouri corporation doing business under the fictitious name of AmerenUE, and is in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. AmerenUE is engaged in providing electric and gas services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). AmerenUE is also engaged in providing electric and gas service in portions of Illinois. There is already on file with the Commission a certified copy of Union Electric Company's Articles of Incorporation and Certificate of Corporate Good Standing (see MPSC Case No. EA-87-105), and Union Electric Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See MPSC Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Communications with regard to this matter should be directed to:

David B. Hennen
Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149
314-554-4673 (phone)
314-554-4014 (fax)
dhennen@ameren.com

Comments on the Proposed Net Metering Rule

3. AmerenUE appreciates the opportunity to provide these comments and the opportunity it was afforded to develop the proposed rule during the workshops conducted by the Staff. AmerenUE believes that the input provided by all during the workshops has resulted in a proposed rule that is well drafted and consistent with the legislation. For these reasons, AmerenUE is providing these comments in support of the proposed rule.

4. With regard to any customer-generator, AmerenUE's primary concern is that the operation of the customer-generator does not in any way expose the general public or AmerenUE employees or contractors to potential safety risks as a result of the operation of the customer-generator. We think the rule as currently written will provide these protections.

5. However, one concern that we do have with the proposed rule is that the \$100,000 customer-generator liability insurance obligation has been set too low. We would suggest that a minimum of \$250,000 of liability insurance be provided for coverage of all risk of liability for personal injuries (including death) and damage to property.

WHEREFORE, AmerenUE respectfully requests that the Commission give due consideration to the comments provided herein.

Dated: May 15, 2003

Respectfully submitted,

Union Electric Company d/b/a AmerenUE

/s/David B. Hennen

David B. Hennen, #46776

Associate General Counsel

Ameren Services Company

One Ameren Plaza

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

314-554-4673

314-554-4014 (fax)

dhennen@ameren.com

Attorney for Union Electric Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the following parties of record via electronic mail or U.S. First-Class Mail, postage prepaid, on this 15th day of May, 2003:

Dana K. Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
djoyce@psc.state.mo.us

John B. Coffman
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102
jcoffman@ded.state.mo.us

/s/David B. Hennen