

September 25, 1998

FILED

VIA FEDERAL EXPRESS

SEP 28 1998

Mr. Dale Hardy Roberts
Executive Secretary
Missouri Public Service Commission
301 W. High Street, 7-N
Jefferson City, MO 65101

Missouri Public
Service Commission



Re: In the matter of the application of Union Electric Company d/b/a AmerenUE for a certificate of public convenience and necessity authorizing it to construct, install, own, operate, control, manage and maintain natural gas pipeline facilities and a gas distribution system for the public in a portion of St. Charles County, Missouri, as an expansion of its presently certificated area
Case No. GA-99-107

Dear Mr. Roberts:

On September 15, 1998, Union Electric Company d/b/a AmerenUE filed its Application for a Certificate of Public Convenience and Necessity in the above-referenced case. Since that filing, it has come to the Company's attention that two of the numbers comprising the Case No. referred to in paragraphs 3 and 4 of the Application were inadvertently transposed. The correct Case No. is "15,759", not "15,579" as appears in the pleading.

Enclosed for filing are fifteen (15) copies of pages 2 and 3 of the Application which have been revised to reflect "Case No. 15,759". Please substitute these revised pages for those in the original filing.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Please accept my apology for any inconvenience that this error may have caused.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Evans", written over a horizontal line.

Ronald K. Evans
Managing Associate General Counsel

Enclosure

cc/encl:

Office of the Public Counsel
Gerald T. McNeive, Sr. Vice President and General Counsel
J. Gray, MPSC Staff

2. Pleadings, notices, orders and other correspondence concerning this Application should be addressed to:

Ronald K. Evans
Managing Associate General Counsel
Ameren Services Company
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

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3. As a part of its existing gas distribution service area in the State of Missouri, Applicant provides gas sales and transportation service to portions of Pike, Lincoln, Warren, Montgomery and St. Charles Counties, including among other communities, the Cities of Wentzville, Troy, Warrenton, High Hill and Winfield. Gas service in these specific communities is supplied pursuant to the Certificate of Convenience and Necessity granted by the Commission to Applicant's former subsidiary, Missouri Edison Company, in Case No. 15,759*. Gas supply for this portion of Applicant's service area (the "Wentzville District Service Area") is delivered to a receipt point on an interstate pipeline owned and operated by Panhandle Eastern Pipe Line Company ("Panhandle") located near Curryville in Pike County and from the intrastate pipeline of Missouri Pipeline Company ("MPC") at a receipt point located near Winfield in Lincoln County. The predominant supply receipt point for this service area is on Panhandle at Curryville, with the MPC connection at Winfield used primarily to satisfy system operational needs. The Wentzville District Service Area and surrounding area are rapidly growing in terms of residential and commercial development.

4. As described more particularly below, Applicant is requesting a certificate of public convenience and necessity to construct, install, own, operate, control, manage and maintain natural gas pipeline facilities outside its presently certificated area for the purpose of reinforcing and increasing the capacity of its existing gas distribution system in the Wentzville District Service Area and for the

purpose of providing gas service in an area along the route of such facilities where natural gas service is currently not available to the public. A St. Charles County General Highway Map marked to show Applicant's proposed service area (outlined in black), including the location of the proposed capacity reinforcement pipeline facilities, is attached hereto as Appendix 1. A legal description in metes and bounds is attached to this Application as Appendix 2. Because of the difficulty of showing and describing the exact boundary lines of the City of Wentzville in these Appendices, the proposed service area identified therein includes areas immediately south of Interstate 70 which have been annexed by that City and are presently served by Applicant pursuant to the Commission's Certificate granted in Case No. 15,759* referred to above. Applicant has been informed by the Director of Public Works for the City of Wentzville that the proposed service area covered by this Application will also eventually be annexed into that City according to its Master Plan currently under development. In the event of such annexation, it is noteworthy that Applicant's proposed service area would also be covered under the Commission's Certificate granted in Case No. 15,759*.

5. Applicant has determined that it will need to reinforce and increase its existing gas distribution system capacity in the Wentzville District Service Area as early as 1999 to accommodate recently added gas load and anticipated future customer growth. Without such reinforcement, Applicant is concerned that during peak conditions it may not be able to provide adequate flows and pressures for customers in the Wentzville and Warrenton areas located at or near the end of Applicant's system. Furthermore, Applicant recognizes that with the limited capacity on its distribution system for the receipt of gas supply at its present MPC receipt point, Applicant's system does not have the reliability advantages of a true two-supply system.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first-class, U.S. mail, postage prepaid, on this 25th day of September, 1998, to the Office of Public Counsel, P.O. Box 7800, Jefferson City, Missouri 65102 and Gerald T. McNeive, Jr., Senior Vice President and General Counsel, Laclede Gas Company, 720 Olive Street, St. Louis, Missouri 63101.



Ronald K. Evans