

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE for Authority to File Tariffs Increasing)	
Rates for Electric Service Provided to Customers in)	Case No. ER-2007-0002
the Company's Missouri Service Area.)	

**STAFF MOTION FOR LEAVE TO FILE
SUPPLEMENTAL IN-SERVICE DIRECT TESTIMONY**

Comes now the Staff of the Missouri Public Service Commission (Staff), and files this Motion For Leave To File Supplemental Direct In-Service Testimony. The Staff witness Michael E. Taylor related in his direct testimony that, among other things, due to the large number of generating units being considered, thirty-six (36) combustion turbine units, and their varied history, not all analysis could be completed by date of the filing of the Staff's direct testimony. Mr. Taylor stated in his direct testimony filed on December 15, 2006 that twenty-four (24) combustion turbines met the Staff's in-service criteria and should be considered fully operational and used for service. He further stated he would supplement his in-service direct testimony with supplemental direct testimony respecting whether the twelve (12) remaining combustion turbine units satisfied the Staff's in-service criteria prior to January 1, 2007 and should be considered fully operational and used for service. Mr. Taylor states in his supplemental direct testimony that the remaining twelve (12) combustion turbine units met the Staff's in-service criteria prior to January 1, 2007 and should be considered fully operational and used for service.

WHEREFORE, the Staff requests leave to file the supplemental in-service direct testimony of Michael E. Taylor.

Respectfully submitted,

/s/Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 15th day of February 2007.

/s/ Steven Dottheim