

**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)	Case No. ER-2008-0318
In the Company's Missouri Service Area.)	

**STAFF MOTION TO REFILE STAFF REVENUE REQUIREMENT
COST OF SERVICE REPORT FILED ON AUGUST 28, 2008**

Comes now the Staff of the Missouri Public Service Commission (Staff), through the General Counsel's Office, and refiles the Highly Confidential and Non-Proprietary versions of the Staff Revenue Requirement Cost Of Service Report previously filed by the Staff on August 28, 2008.

The Staff is seeking leave to make this refiling because Union Electric Company, d/b/a AmerenUE (AmerenUE) has requested that the Staff treat certain information as Highly Confidential that the Staff had not previously treated as Highly Confidential. Through this filing the Staff seeks to address AmerenUE's concern and it is the Staff's understanding that it is easier to address this matter by refiling the two versions of the Staff Revenue Requirement Cost Of Service Report in entirety than by filing individual pages, even if, for example, there are only two pages involved. No substantive changes are being made to the Staff's August 28, 2008 filing.

Since the Regulatory Law Judge assigned to the case was out of the Commission's offices on Monday, September 8, 2008, due to the first of the local public hearings scheduled for these proceedings, undersigned counsel sought procedural guidance from the Chief Regulatory Law Judge. In showing undersigned counsel how to change the designation of a document filed in EFIS from Non-Proprietary to Highly Confidential, the Chief Regulatory Law Judge changed

the designation of the Non-Proprietary version of the Staff Revenue Requirement Cost Of Service Report filed on August 28, 2008 to Highly Confidential. This reclassification, which apparently is intended only as an immediate remedial action pending a formal filing with the Commission, removes the Non-Proprietary version of the Staff Revenue Requirement Cost Of Service Report from view in EFIS by those individuals who do not have clearance to view Highly Confidential information, but it does not result in the information in EFIS that now should be treated as Highly Confidential being marked in EFIS with double asterisks and underlining. The double asterisks and underlining of the Highly Confidential designation can only be achieved by a new filing, which the Staff is now making.

The Staff requests that the Non-Proprietary (now EFIS redesignated Highly Confidential) and Highly Confidential versions of the Staff Revenue Requirement Cost Of Service Report filed on August 28, 2008 be deleted from EFIS and replaced with the versions accompanying this pleading. On the cover of the Non-Proprietary and Highly Confidential versions accompanying this pleading appears the filing date designation:

August 28, 2008

Refiled September 8, 2008

For purposes of clarity, the Staff notes that although the Staff has agreed to the designations of information in the Staff Revenue Requirement Cost Of Service Report that are indicated as Highly Confidential, the Staff cannot speak on behalf of any party other than itself and is not seeking to do so. Also, for purposes of clarity, the Staff notes that it expects that Counsel for the various parties to this proceeding have already distributed to their clients copies of the Staff Revenue Requirement Cost Of Service Report filed on August 28, 2008 with the information that is now being shown as Highly Confidential in the substitute filing, not identified

as Highly Confidential in the original filing. Nonetheless, it is the Staff's belief that the principal matter of concern to AmerenUE has nonetheless been addressed on an immediate short-term basis with the reclassification of the August 28, 2008 Non-Proprietary version of the Staff Revenue Requirement Cost Of Service Report as Highly Confidential, and the principal matter of concern to AmerenUE will be addressed on a longer-term going forward basis if the Commission grants the relief requested in this Staff Motion.

Wherefore, the Staff requests that the Commission delete from EFIS the Non-Proprietary and Highly Confidential versions of the Staff Revenue Requirement Cost Of Service Report filed on August 28, 2008 and accept in their stead the substitute Non-Proprietary and Highly Confidential versions of the Staff Revenue Requirement Cost Of Service Report being filed along with this Staff Motion. No substantive changes are being made to the Staff's August 28, 2008 filing.

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 8th day of September, 2008.

/s/ Steven Dottheim