

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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| In the Matter of Union Electric Company d/b/a |) | |
| AmerenUE for Authority to File Tariffs |) | |
| Increasing Rates for Electric Service Provided to |) | Case No. ER-2010-0036 |
| Customers In the Company's Missouri Service |) | |
| Area |) | |

MISSOURI ENERGY GROUP STATEMENT IN SUPPORT
OF OFFICE OF PUBLIC COUNSEL'S MOTION TO CONFORM TARIFFS

COMES NOW the Missouri Energy Group ("MEG"), and for its Statement in Support of the Office of Public Counsel ("OPC") *Motion to Conform Tariffs With Suspension and Motion for Expedited Treatment* states as follows:

1. On May 28, 2010, the Missouri Public Service Commission ("Commission") issued a Report and Order rejecting the tariffs proposed by Union Electric Company d/b/a/ AmerenUE (as of this date d/b/a Ameren Missouri but hereinafter referred to as "AmerenUE") to increase rates by \$402 million annually and authorized AmerenUE to file new tariffs to increase rates by approximately \$228 million annually.

2. On June 6, 2010, the Missouri Industrial Energy Consumers ("MIEC") filed a Writ of Review with the Cole County Circuit Court appealing the Commission's \$228 million rate increase decision and requesting a stay of the rates pursuant to §386.520 RSMo.

3. On December 20, 2010, the Circuit Court issued its *Order Granting Stay Pursuant to Section 386.520* and on February 15, 2011 MIEC posted the suspending bonds ordered by the Circuit Court. The Circuit Court's Stay Order requires that AmerenUE's rates be

suspended to a level previously approved in a lawful manner, which the Circuit Court stated are the 2007 rates.

4. On February 16, 2011 the OPC filed a *Motion to Conform Tariffs with Suspension and Motion for Expedited Treatment* with this Commission. Later that same day, MIEC filed a Response to OPC's Motion

5. On February 18, 2011 the Commission issued its *Order Establishing Date to Respond to Public Counsel's Motion to Conform Tariffs With Suspension* setting today, February 25, 2011, as the due date for responses to OPC's Motion.

6. On February 21, 2011, The Consumers Council of Missouri and AARP filed responses to OPC's Motion.

5. MEG agrees with OPC's Motion and the subsequent responses of MIEC, CCM and AARP that AmerenUE's customers are irreparably harmed by the continued collection of these amounts.

WHEREFORE, MEG respectfully requests that the Commission grant OPC's February 16, 2011 Motion to conform tariffs with suspension as expeditiously as reasonably possible.

Respectfully submitted,

SANDBERG PHOENIX & von GONTARD P.C.

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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. ER-2010-0036.

Dated at St. Louis, Missouri this 25th day of February, 2011

/s/Lisa C. Langeneckert
Lisa C. Langeneckert