

**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)	Case No. ER-2010-0036
Tariffs Increasing Rates for Electric Service)	
Provided to Customers in the Company's)	
Missouri Service Area)	

INTERIM RATES: STATEMENT OF POSITION BY MJMEUC

COMES NOW, the Missouri Joint Municipal Electric Utility Commission

("MJMEUC") by and through their attorney, Douglas L. Healy, and in response to the

Commission of November 12, 2009, state as follows:

ISSUES

- I. Do the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE?
- a. Should there be criteria for the Commission to use to decide whether interim rate relief is warranted? If so, what should that criteria be?

Position: MJMEUC generally favors AmerenUE's request for interim rates, provided such relief is just and reasonable, properly balances the needs of the public and shareholders, and is subject to refund. MJMEUC does not take any position concerning the procedures for determining such a request.

- II. If the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE, has AmerenUE provided adequate justification for the proposed level of interim rate relief?
- a. Should there be criteria for the Commission to use to determine the appropriate level of interim rate relief? If so, what should that criteria be?

Position: MJMEUC generally favors AmerenUE's request for interim rates, provided such relief is just and reasonable, properly balances the needs of the public and shareholders, and is subject to refund. MJMEUC does not take any position concerning the procedures for determining such a request.

III. If the Commission finds that the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as proposed by AmerenUE, may and should the Commission adopt criteria for interim rate relief with greater applicability than the instant case?

Position: MJMEUC generally favors AmerenUE's request for interim rates, provided such relief is just and reasonable, properly balances the needs of the public and shareholders, and is subject to refund. MJMEUC does not take any position concerning the procedures for determining such a request.

IV. Is any interim rate relief criteria other than the emergency/near emergency criteria lawful?

Position: MJMEUC does not take any position concerning the procedures for determining such a request.

V. If the emergency / near emergency criteria is not the sole lawful criteria for interim rate relief, what other criteria is lawful?

Position: MJMEUC does not take any position concerning the procedures for determining such a request.

Respectfully Submitted,

By: /s/ Douglas L. Healy
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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Statement of Position was served by electronic mail to all counsel of record this 3rd day of December, 2009:

/s/ Douglas L. Healy
DOUGLAS L. HEALY