

In the Matter of the Tariff Filings of Union)
Electric Company d/b/a Ameren Missouri, to) Case No. ER-2012-0166
Increase Its Revenues for Retail Electric Service.)

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and pursuant to the Commission’s Report and Order in the above-captioned case issued December 12, 2012 (the “Report and Order”) and 4 CSR 240-2.080(16), hereby files its Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Report and Order on Less Than Thirty Days’ Notice. In support of its Motion, Ameren Missouri states as follows:

3. Section 393.140(11), RSMo. specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after

¹ Ameren Missouri has complied with this Commission rule by filing the compliance tariffs with a thirty day effective date, despite Ameren Missouri's belief that thirty days' notice is unnecessary under these circumstances, particularly given the specific provisions of Section 393.140(11), discussed below.

thirty days' notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make the Company's compliance tariffs effective on or before the operation of law date in this case because the Commission has already found that Ameren Missouri is presently in a revenue deficiency position, and the Commission has already authorized the Company to file the tariffs that are filed concurrently with the filing of this Motion.

4. As provided for in 4 CSR 240-2.080(16), the Company requests that the Commission approve the compliance tariffs so that they may take effect on the operation of law date in this case (January 2, 2013), and the Commission, as noted earlier, has good cause to do so. Furthermore, the Company states that by doing so, the Commission will avoid the harm that would be caused by failing to timely allow rates determined to have been just and reasonable to take effect as soon as possible. Moreover, there can be no negative effect on anyone – ratepayers or the Company – if the compliance tariffs are approved to be effective January 2, 2013 because this will allow the rates determined by this Commission to be just and reasonable rates to in fact be charged for the electric service provided by the Company.²

5. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, for the foregoing reasons and for good cause shown, Ameren Missouri respectfully requests that the Commission grant this Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Report and Order On Less Than Thirty Days' Notice, and approve the tariff sheets Ameren Missouri has filed to be effective for service rendered on and after January 2, 2013.

² As stated on page 13 of the Report and Order, the public interest is in fact served by the establishment of just and reasonable rates.

Respectfully submitted,

/s/ James B. Lowery
James B. Lowery, Mo. Bar #40503
SMITH LEWIS, LLP
P.O. Box 918
Columbia, MO 65205-0918
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com

Thomas M. Byrne, Mo. Bar #33340
Union Electric Company
d/b/a Ameren Missouri
P.O. Box 66149 (MC 1310)
1901 Chouteau Avenue
St. Louis, MO 63166-6149
(T) 314-554-2514
(F) 314-554-4014
AmerenMoService@ameren.com

**Attorneys for Union Electric Company
d/b/a Ameren Missouri**

Dated: December 17, 2012

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 17th day of December, 2012.

/s/James B. Lowery
James B. Lowery