

**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)	Case No. ER-2007-0002
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

MOTION TO CONSOLIDATE

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or ("Company"), pursuant to 4 CSR 240-2.110(3), and hereby requests the Commission to enter its order consolidating the Company's electric general rate increase request, Case No. ER-2007-002 with the Company's gas general rate increase request, Case No. GR-2007-0003, and as reasons therefor, states as follows:

1. On July 7, 2006 the Company filed tariffs and supporting direct testimony seeking a general rate increase for both its electric and natural gas operations. Two cases were established, Case No. ER-2007-0002 (the electric case) and Case No. GR-2007-0003 (the gas case).

2. The subject electric and gas systems are both owned and operated by the Company and receive services from the same service companies. There is also geographic overlap of both the electric and gas systems in several areas of the state.

3. On July 11, 2006, the Commission issued an Order Directing Notice, Suspending Tariff, Setting Hearings, and Directing Filings in each of Case Nos. ER-2007-002 and GR-2007-0003. These Orders set the evidentiary hearing dates for both the gas and electric cases on the same dates, March 12 through March 16, and March 19 through March 23, 2007. These Orders

also contemplate that applications to intervene, pleadings relating to the test year and any true-up, and a prehearing conference be due or held, as applicable, on the same dates.

4. 4 CSR 240-2.110(3) authorizes the Commission to consolidate cases where they involve related questions of law or fact. The foregoing demonstrates that both of these cases involve related questions of law and fact and consequently they should be consolidated for that reason, and for reasons of administrative convenience and case management efficiency.

5. The Company has conferred with the Staff of the Commission, and the Staff supports the Company's consolidation request made herein.

WHEREFORE, the Company hereby requests that the Commission enter its order consolidating Case No. ER-2007-002 with Case No. GR-2007-003, that it designate Case No. ER-2007-0002 as the lead case, and that it order that all pleadings and data requests hereafter filed or served in either case be filed or served using Case No. ER-2007-0002 as the lead case.

Dated: July 19, 2006

SMITH LEWIS, LLP

/s/James B. Lowery

James B. Lowery, #40503
Suite 200, City Centre Building
111 South Ninth Street
P.O. Box 918
Columbia, MO 65205-0918
Phone (573) 443-3141
Facsimile (573) 442-6686
lowery@smithlewis.com

**Attorneys for Union Electric Company
d/b/a AmerenUE**

Steven R. Sullivan, #33102
Sr. Vice President, General
Counsel and Secretary
Thomas M. Byrne, # 33340
Managing Assoc. General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-2098
(314) 554-2514 (phone)
(314) 554-4014 (fax)
ssullivan@ameren.com
tbyrne@ameren.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 19th day of July, 2006.

Office of the General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101
gencounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101
opcservice@ded.mo.gov

/s/James B. Lowery
James B. Lowery