## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City	)	
Power & Light Company for Approval to Make	)	
Certain Changes in its Charges for Electric	)	Case No. ER-2010-0355
Service to Implement its Regulatory Plan.	)	
	)	
In the Matter of the Application of KCP&L	)	Case No. ER-2010-0356
Greater Missouri Operations Company to Make	)	
Certain Changes in its Charges for Electric Service.	)	

## UNION ELECTRIC COMPANY'S STATEMENT OF POSITION

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri"), and respectfully files its Statement of Position in the above-captioned matter. In this regard, AmerenUE states as follows:

- 1. The Commission's August 18, 2010 Order Approving Non-unanimous Stipulation and Agreement, Setting Procedural Schedule, and Clarifying Order Regarding Construction and Prudence Audit directed the filing of statements of position in this case, with the statements due on January 11, 2011.
- 2. Ameren Missouri has not filed testimony in this case, but is participating in this case because of its direct and specific interest in some of the issues raised in this case, including the Commission's treatment of various revenue and expense items and, in particular, the Commission's examination of the companies' inclusion in rate base of air quality improvements at the Iatan Plant.
- 3. Given Ameren Missouri's somewhat limited involvement in this case, Ameren Missouri at this time takes no position on the issues set forth in the issue list filed herein.

  Ameren Missouri reserves its right to assert its positions on various issues when evidence is

presented during the evidentiary hearings in this case, to file post-hearing briefs, to file true-up testimony, or to otherwise participate fully in further proceedings in this case.

Dated: January 11, 2011

Respectfully submitted,

SMITH LEWIS, LLP

## /s/ James B. Lowery

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

Thomas M. Byrne, Mo. Bar No. 33340 Managing Associate General Counsel Ameren Services Company 1901 Chouteau Avenue (MC 1310) St. Louis, MO 63103 P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 (314) 554-2514 (314) 554-4014 (fax) tbyrne@ameren.com

**Attorneys for Ameren Missouri** 

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served via electronic mail (e-mail) or via regular mail on this 11th day of January, 2011, on counsel for all parties to this case:

<u>/s/ James B. Lowery</u> James B. Lowery