

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri's Tariffs to Increase Its Annual Revenues for) File No. ER-2012-0166
Electric Service.)

**AMEREN MISSOURI'S MOTION TO STRIKE
A PORTION OF STAFF'S REPLY BRIEF**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and
for its Motion to Strike A Portion of Staff's Reply Brief states as follows:

1) On November 15, 2012, Staff of the Missouri Public Service Commission (Staff) filed its Reply Brief in this case. On page 34 of its Reply Brief, for the first time Staff argued that 25% of the cost of Ameren Missouri's coal pile should be excluded from rate base based on the timing of Ameren Missouri's payment for the coal in that portion of the coal pile.

2) It is completely inappropriate for Staff to bring up for the first time in its Reply Brief a new adjustment. Staff filed no testimony in support of this proposed adjustment and Ameren Missouri had no opportunity to conduct discovery with respect to this proposed adjustment or to file responsive testimony or to file a responsive brief.

3) Moreover, as explained in Ameren Missouri's briefs addressing the coal in transit issue, the timing of the payment for rate base items is accounted for in the cash working capital adjustment and should not impact whether an item is included in or excluded from rate base. Consequently, there is no basis whatsoever for this proposed adjustment.

WHEREFORE, Ameren Missouri respectfully requests that the portion of Staff's Reply Brief referenced above be stricken.

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 26th day of November, 2012.

/s/ Thomas M. Byrne
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