BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of Kansas City |) | |
|---|---|-----------------------|
| Power & Light Company's Request for |) | Case No. ER-2012-0174 |
| Authority to Implement a General Rate |) | |
| Increase for Electric Service. |) | |
| In the Matter of KCP&L Greater |) | |
| Missouri Operations Company's Request for |) | Case No. ER-2012-0175 |
| Authority to Implement a General Rate |) | |
| Increase 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 consolidated cases. In this regard, Ameren Missouri states as follows:

- 1. The Commission's scheduling order in this case directed the filing of statements of position in this case, with the statements due on October 12, 2012.
- 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.
- 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: October 12, 2012

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery

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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 12th day of October, 2012, on counsel for all parties to this case.

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