

**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-2010-0036
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

UNIONS' POSITION STATEMENT

COME NOW International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Union of Operating Engineers Local 148, AFL-CIO ("Unions"), by counsel, and respectfully state their position on the following issues:

The Unions support granting Ameren the requested rate increase, subject to restrictions and reporting requirements to insure that Ameren uses the additional revenue productively to insure reliability, long-term efficiency and quality of service, and address an aging workforce, as follows:

1. The Unions support increasing funds to improve Ameren's employee infrastructure in general, including recruitment of new employees and training of its internal workforce, including advanced training to comply with new regulations and standards, support cutting edge and future technological advances, such as the "smart grid." Ameren's reliance on subcontractors has reduced Ameren's ability to maintain its normal and sustained workload.

2. The Unions support requiring Ameren to fully and permanently staff itself to support its normal and sustained workload. Ameren currently relies excessively on subcontractors who are often less skilled than Ameren employees and are certainly less

familiar with Ameren equipment and processes. Permanent staffing will reduce the need for costly subcontracting.

3. In regard to the issues addressed in paragraphs 1-2, the Unions position that Ameren should be required to report quarterly to the PSC Staff and the other parties about all internal and external recruitment, hiring, training, qualifying standards and certification. Furthermore, given the current and anticipated shortages in skilled utility workers, Ameren should be required to submit for PSC for review a development plan for addressing these needs. That development plan should reflect an adequate portion of the ultimate rate increase to be invested in workforce development. The Unions suggest that the PSC develop guidelines and expectations for Ameren to follow in creating this development plan.

4. The Unions' position is that Ameren be required to make good faith efforts to hire its workforces locally, and if that is not possible, regionally within their service territory. Ameren should not be permitted to spend rate payer money to fund jobs overseas. This will improve the quality of work, customer relations and further the State interest of employing Missouri residents.

5. The Unions further support requiring Ameren to invest in its physical infrastructure. Ameren is operating a seriously aging system which needs to be updated or replaced. In addition, portions of the system need to be replaced or updated to enable Ameren to implement current and future technological advances. Again, the smart grid is a good example. Upgrades to the transmission and distribution systems are necessary to permit Ameren to realize technological improvements that improve reliability, security and efficiency, while reducing carbon emissions. These advances would make it easier

for Ameren to interface with non-traditional energy sources such as solar, nuclear and wind power. Missouri only received one direct, relatively small, award under the American Recovery and Reinvestment Act of 2009 for Smart Grid Investment last fall.¹ Infrastructure improvements and development planning is necessary if Ameren is to be competitive for future grants and to help attract future industry in Missouri.

6. Thus, Ameren should be required to submit for PSC review a development plan for addressing the needs described in paragraph 5. Furthermore, the Unions suggest that Ameren should be required to report quarterly to the PSC Staff and the other parties about its planning and spending on physical infrastructure improvements, including policies concerning repairing and rebuilding components and equipment internally.

7. At this time, the Unions take no position on any other issues raised in this matter.

Respectfully submitted,

/s/ Sherrie A. Schroder

SHERRIE A. SCHRODER, MBN 40949
MICHAEL A. EVANS, MBN 58583
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
mevans@hstly.com (email)
saschroder@hstly.com (email)
Attorneys for the Unions

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on March 10, 2010, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

¹ The City of Fulton received an award in the amount of \$1,527,641.

/s/ Sherrie A. Schroder
