

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
AmerenUE's Tariffs to Increase its Annual) Case No. ER-2008-0318
Revenues for Electric Service)

**STATEMENT OF POSITION BY MISSOURI COALITION FOR THE
ENVIRONMENT AND MISSOURIANS FOR SAFE ENERGY**

Come now Missouri Coalition for the Environment and Missourians for Safe Energy, and state their position as follows.

Due to the limited nature of their intervention, MCE and MSE take "No Position" on any issue except the following.

9. **Callaway Unit II Combined Construction And Operating License Application (COLA) Costs:** Should or can the costs of the combined construction and operating license application to the Nuclear Regulatory Commission for the prospective Callaway II unit be recovered in rates by AmerenUE? Can any such recovery proceed without a determination of public convenience and necessity or does AmerenUE intend to rely on the 1975 certificate?

MCE and MSE believe that allowing recovery of COLA costs at this time would violate § 393.135, RSMo. They further believe that no costs associated with the construction of Callaway 2 should be allowed before a determination of public convenience and necessity is made pursuant to § 393.170.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 13th day of November, 2008, to all parties of record.

/s/Henry B. Robertson
Henry B. Robertson