

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

In the Matter of Union Electric Company,)	Case No. ER-2010-0036
d/b/a AmerenUE's Tariffs to Increase Its)	Tariff Nos.YE-2010-0054
Annual Revenues for Electric Service)	and YE-2010-0055

**UNIONS' POSITION STATEMENT AND REQUEST TO BE
EXCUSED FROM HEARING ON INTERIM RATE TARIFF**

COMES 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 and through counsel, in response to the November 12, 2009 Order Modifying Procedural Schedule For Consideration Of Interim Rate Tariff.

ISSUES TO BE HEARD AND UNIONS' POSITION THERON

- I. Do the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE?
 - a. Should there be criteria for the Commission to use to decide whether interim rate relief is warranted? If so, what should that criteria be?

Position: The Unions do not take any position as to AmerenUE's request for interim rate relief. The Unions further do not take any position concerning the procedures for determining such a request.

- II. If the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as generally proposed by AmerenUE, has AmerenUE provided adequate justification for the proposed level of interim rate relief?
 - a. Should there be criteria for the Commission to use to determine the appropriate level of interim rate relief? If so, what should that criteria be?

Position: The Unions do not take any position as to AmerenUE's request for interim rate relief. The Unions further do not take any position concerning the procedures for determining such a request.

- III. If the Commission finds that the circumstances presently encountered by AmerenUE warrant the Commission authorizing AmerenUE interim rate relief as proposed by AmerenUE, may and should the Commission adopt criteria for interim rate relief with greater applicability than the instant case?

Position: The Unions do not take any position concerning the procedures for determining such a request.

IV. Is any interim rate relief criteria other than the emergency/near emergency criteria lawful?

Position: The Unions do not take any position concerning the procedures for determining such a request.

V. If the emergency / near emergency criteria is not the sole lawful criteria for interim rate relief, what other criteria is lawful?

Position: The Unions do not take any position concerning the procedures for determining such a request.

UNIONS REQUEST TO BE EXCUSED FROM HEARING

Given the Unions' lack of input on the issues in this request for interim rate relief, the Unions respectfully request that they be excused from attending the hearing on the Interim Rate Tariff. The Unions have every intention of fully participating in the hearing for final relief in this matter.

Respectfully submitted,

/s/ Sherrie A. Schroder
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 3rd day of December, 2009.

/s/ Sherrie A. Schroder