

**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-2007-0002
Service Provided to Customers in the)	
Company's Missouri Service Area)	

Motion to Late-File Exhibit

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”), and hereby moves to late-file the attached Exhibit to address a request made by Commissioner Gaw during the evidentiary hearings in this case.

1. During the hearings held in March, Commissioner Gaw requested that AmerenUE provide, as an exhibit, a list of the Company's worst performing circuits by year, since 2002.

2. Attached to this Motion is the requested information along with an affidavit from Ronald C. Zdellar, Vice President of Delivery and Distribution Services, attesting to the accuracy of the list.

3. Starting in January of 2007, AmerenUE changed its methodology of calculating its worst performing circuits. For the years 2002 through 2006, the list was based strictly on the total customer interruptions on a circuit each year. This meant that one circuit with 1,000 customers which experienced one interruption was counted as 1,000 interruptions for that circuit. Starting in 2007, AmerenUE began using the three year average SAIFI number. The Company feels this method is a more appropriate manner to identify its worst performing circuits, but the change in methodology does not allow for a direct comparison of 2007 to prior years.

WHEREFORE, pursuant to 4 CSR 240-2.130, AmerenUE hereby moves to late-file the attached list of worst performing circuits and offers the same into evidence as a late-filed exhibit in this case.

/s/ Wendy K. Tatro

Steven R. Sullivan, # 33102

Sr. Vice President, General Counsel and
Secretary

Thomas M. Byrne, # 33340

Managing Assoc. General Counsel

Wendy K. Tatro, KS # 19232

Asst. General Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served via e-mail on this 18th day of April, 2007, on all counsel of record according to the Commission's service list in Case No. ER-2007-0002.

/s/ Wendy K. Tatro

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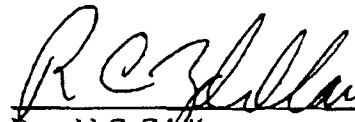
Case No. ER-2007-0002

AFFIDAVIT OF RONALD C. ZDELLAR

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

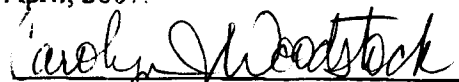
Ronald C. Zdellar, being first duly sworn on his oath, states:

1. My name is Ronald C. Zdellar. I work in St. Louis, Missouri and I am Vice President of Delivery and Distribution Services.
2. Attached hereto is a copy of AmerenUE's worst performing circuits for the years 2002 through 2007, which have been prepared in written form for introduction into evidence in the above-referenced docket, as requested by the Commission during the hearing in this case.
3. I hereby swear and affirm that information contained in the attachment to this affidavit is true and correct to the best of my knowledge and belief.



Ronald C. Zdellar

Subscribed and sworn to before me this 18th day of April, 2007.



Notary Public

My commission expires: May 19, 2008

CAROLYN J. WOODSTOCK
Notary Public - Notary Seal
STATE OF MISSOURI
Franklin County
My Commission Expires: May 19, 2008