BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Noranda Aluminum, Inc., et al, Complainants, v. Union Electric Company, d/b/a Ameren Missouri Respondent.

Case No. EC-2014-0223

JOINT POSITION STATEMENT OF AARP AND THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW AARP and the Consumers Council of Missouri ("Consumers

Council" or "CCM"), and provides the following position statement (in bold):

1. Can and should the Commission order a reduction in Ameren Missouri's rates as proposed by Complainants, to apply to service rendered after the conclusion of this case?

Yes, the testimonies of Complainant witnesses Greg R. Meyer and Michael P. Gorman provide the Commission with sufficient evidence to prove that Ameren Missouri is currently over-earning by a substantial and material amount with regard to its jurisdictional electric rates. The testimony offered by Staff also supports a finding of substantial and material over-earnings by this utility under the currently authorized ROE.

Consumers deserve to have a timely reduction in rates implemented based upon the record in this case, which contains all relevant factors necessary to establish new rates pursuant to Chapters 386 and 393 of the Revised Statutes of Missouri. Missouri law contains no requirement regarding the number of issues that the Staff of the Commission must review, in order for the "all relevant factors" test to be met.

The Commission can and should make a finding of over-earnings (and that the utility's authorized ROE needs to be adjusted to align with Mr. Gorman's recommended ROE), and the Commission can and should proceed to order a reduction in electric rates to apply to future service rendered at the conclusion of this case.

Respectfully submitted,

/s/ John B. Coffman

John B. Coffman MBE #36591 John B. Coffman, LLC 871 Tuxedo Blvd. St. Louis, MO 63119-2044 Ph: (573) 424-6779 E-mail: john@johncoffman.net

Attorney for AARP and for Consumers Council

Dated: July 22, 2014

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or handdelivered to the parties contained on official service list of this proceeding on this 22nd day of July, 2014.

/s/ John B. Coffman