

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

In the Matter of the Second Prudence Review of)
Costs Subject to the Commission-Approved Fuel) Case No. EO-2012-0074
Adjustment Clause of Union Electric Company)
d/b/a Ameren Missouri.)

**AMEREN MISSOURI’S EARLY REQUEST FOR
HEARING**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and,
hereby submits its Early Request for Hearing, as follows:

1. On October 28, 2011, following the September 8, 2011 commencement date of its second prudence audit of Ameren Missouri’s fuel adjustment clause, the Missouri Public Service Commission Staff (“Staff”) filed a partial recommendation regarding the period under review in this docket, which it entitled “Staff’s Prudence Report and Recommendation Regarding Wabash and AEP Contracts” (the “Partial Report”). The Partial Report recommends the Commission find that Ameren Missouri was “imprudent” in not including all costs and revenues associated with certain sales of energy to American Electric Power Operating Companies and Wabash Valley Power Association, Inc. during the review period in determining associated fuel adjustment clause rates. The Partial Report recommends that the Commission order Ameren Missouri to refund **\$_____**, plus interest accrued after May 31, 2011, to its customers through an adjustment to its fuel adjustment clause rates.

2. Ameren Missouri disputes the Staff’s claim of imprudence. In addition, even if the Staff’s claim of imprudence were correct, Ameren Missouri disputes the amount of the proposed refund. Finally, Ameren Missouri disputes (as the Staff’s Partial Report appears to assume) that the Commission’s Fuel Adjustment Clause rules permit a partial, bifurcated Staff recommendation or a bifurcated prudence review proceeding in which isolated adjustments are made prior to the conclusion

of the complete prudence review contemplated by the Commission's FAC rules. The applicable FAC rules contemplate that an entire prudence audit will be conducted, that the Staff will file a recommendation on that entire prudence review within 180 days of the commencement of the prudence audit, and that any other party (including Ameren Missouri) then has until the 190th day after commencement of the prudence audit to request a hearing. That deadline is 130 days away. However, in light of the Staff's Partial Report, Ameren Missouri hereby files this request for a hearing and hereby notifies the Commission that it intends to file another request for a hearing after the Staff files its complete examination and analysis as contemplated by 4 CSR 240-20.090(7)(B), but in no event later than 190 days after this prudence review commenced.

WHEREFORE, Ameren Missouri respectfully requests a hearing regarding Staff's recommendation.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

SMITH LEWIS, LLP

/s/Thomas M. Byrne
Thomas M. Byrne, #33340
Managing Associate General Counsel
1901 Chouteau Avenue, MC-1310
P.O. Box 66149, MC-131
St. Louis, MO 63101-6149
(314) 554-2514 (Telephone)
(314) 554-4014 (Facsimile)
AmerenMissouriService@ameren.com

Attorneys for Ameren Missouri

/s/ James B. Lowery
James B. Lowery, #40503
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
(573) 443-3141
(573) 442-6686 (Facsimile)
lowery@smithlewis.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on November 7, 2011, to all parties of record.

Office of the Public Counsel

Lewis Mills
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
Phone: 573-751-1304
Fax: 573-751-5562
opcservice@ded.mo.gov

Missouri Public Service Commission

Office General Counsel
Nathan Williams
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Phone: 573-751-2690
Fax: 573-751-9285
GenCounsel@psc.mo.gov
Nathan.williams@psc.mo.gov

Missouri Retailers Association

James B Deutsch
Thomas Schwarz
308 E High St., Ste. 301
Jefferson City, MO 65101
Phone: 573-634-2500-Ext:
Fax: 573-634-3358
jdeutsch@blitzbardgett.com
tschwarz@blitzbardgett.com

Missouri Retailers Association

Sam Overfelt
618 E. Captiol Ave
PO Box 1336
Jefferson City, MO 65102
Phone: 573-636-5128-Ext:
moretailers@aol.com

AARP

John B Coffman
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Phone: 573-424-6779-Ext:
Fax: nul-l -
john@johncoffman.net

Missouri Energy Group

Lisa C Langeneckert
600 Washington Avenue, 15th Floor
St. Louis, MO 63101-1313
Phone: 314-231-3332-Ext:
Fax: 314-241-7604
llangeneckert@sandbergphoenix.com

Natural Resources Defense Council

Henry B Robertson
705 Olive Street, Suite 614
St. Louis, MO 63101
Phone: 314-231-4181-Ext:
Fax: 314-231-4184
hrobertson@greatriverslaw.org

St. Louis County Municipal League

Carl J Lumley
Leland B. Curtis
Kevin M. OKeefe
130 S. Bemiston, Ste 200
St. Louis, MO 63105
Phone: 314-725-8788-Ext:
Fax: 314-725-8789
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com
kokeefe@lawfirmemail.com

Missouri Joint Municipal Electric Utility Commission

Douglas Healy
939 Boonville Suite A
Springfield, MO 65802
Phone: 417-864-8800-Ext:
doug@healylawoffices.com

Missouri Industrial Energy Consumers

Diana M Vuylsteke
Brent Roam
Mark B. Leadlove
211 N. Broadway, Suite 3600
St. Louis, MO 63102
Phone: 314-259-2543-Ext:
Fax: 314-259-2020
dmvuylsteke@bryancave.com
brent.roam@bryancave.com
mbleadlove@bryancave.com

Missouri Industrial Energy Consumers

Edward F Downey
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Phone: 573-556-6622-Ext:
efdowney@bryancave.com

Missouri Department of Natural Resources

Mary Ann Young
Lewis & Clark State Office Building,
4E
1101 Riverside Dr., 4th Fl. East, Rm.
456
Jefferson City, MO 65109-0176
Phone: 573-526-7052-Ext:
Fax: 573-526-7553
maryann.young@dnr.mo.gov

Association of Community Organizations for Reform Now

Thomas G Glick
7701 Forsyth Blvd, Ste 800
St. Louis, MO 63105
Phone: 314-726-1000-Ext:
Fax: 314-725-6592
tglick@dmfirm.com

City of O'Fallon, Missouri, City of Rock Hill, Missouri, City of University City, Missouri

Carl J Lumley
130 S. Bemiston, Ste 200
St. Louis, MO 63105
Phone: 314-725-8788-Ext:
Fax: 314-725-8789
clumley@lawfirmemail.com

Consumers Council of Missouri

John B Coffman
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Phone: 573-424-6779-Ext:
Fax: nul-l -
john@johncoffman.net

Kansas City Power & Light Company

Karl Zobrist
4520 Main Street, Suite 1100
Kansas City, MO 64111
Phone: 816-460-2545-Ext:
Fax: 816-531-7545
karl.zobrist@snrdenton.com

Laclede Gas Company

Rick E Zucker
720 Olive Street
St. Louis, MO 63101
Phone: 314-342-0533-Ext:
Fax: 314-421-1979
rzucker@lacledegas.com

Charter Communications (Charter)

John C Dodge
1919 Pennsylvania Ave. NW, Suite 200
Washington, DC 20006
Phone: 202-973-4205-Ext:
johndodge@dwt.com

City of O'Fallon, Missouri, City of Rock Hill, Missouri, City of University City, Missouri

Leland B Curtis
130 S. Bemiston, Suite 200
St. Louis, MO 63105
Phone: 314-725-8788-Ext:
Fax: 314-725-8789
lcurtis@lawfirmemail.com

IBEW Local Unions 1439, 1455, 2, 309, 649, 702; International Union of Operating Engineers-Local No 148

Sherrie A Schroder
7730 Carondelet Ave., Ste 200
St. Louis, MO 63105
Phone: 314-727-1015-Ext:
Fax: 314-727-6804
saschroder@hammondshinners.com

Kansas City Power & Light Company

Roger W Steiner
1200 Main Street, 16th Floor
P.O. Box 418679
Kansas City, MO 64105-9679
Phone: 816-556-2314-Ext:
Fax: 816-556-2787
roger.steiner@kcpl.com

Midwest Energy Users' Association

David Woodsmall
428 E. Capitol Ave., Suite 300
Jefferson City, MO 65101
Phone: 573-635-2700-Ext:
Fax: 573-635-6998
dwoodsmall@fcplaw.com

Charter Communications (Charter)

Mark W Comley
601 Monroe Street., Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
Phone: 573-634-2266-Ext: 301
Fax: 573-636-3306
comley@ncrpc.com

City of O'Fallon, Missouri, City of Rock Hill, Missouri, City of University City, Missouri

Kevin M OKeefe
130 S. Bemiston, Ste. 200
Clayton, MO 63105
Phone: 314-725-8788-Ext:
Fax: 314-725-8789
kokeefe@lawfirmemail.com

IBEW Local Unions 1439, 1455, 2, 309, 649, 702; International Union of Operating Engineers-Local No 148

Michael A Evans
7730 Carondelet, Suite 200
St. Louis, MO 63105
Phone: 314-727-1015-Ext:
Fax: 314-727-6804
mevans@hammondshinners.com

Laclede Gas Company

Michael C Pendergast
720 Olive Street, Suite 1520
St. Louis, MO 63101
Phone: 314-342-0532-Ext:
Fax: 314-421-1979
mpendergast@lacledegas.com

Missouri Department of Natural Resources

Sarah B Mangelsdorf
207 West High St.
P.O. Box 899
Jefferson City, MO 65102
Phone: 573-751-0052-Ext:
Fax: 573-751-8796
sarah.mangelsdorf@ago.mo.gov

/s/ Thomas M. Byrne

Thomas M. Byrne