

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

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| In re: Union Electric Company's |) | |
| 2011 Utility Resource Filing pursuant to |) | Case No. EO-2011-0271 |
| 4 CSR 240 – Chapter 22. |) | |

JOINT FILING

COMES NOW Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri), the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), the Missouri Department of Natural Resources (DNR), Missouri Industrial Energy Consumers (MIEC), Missouri Energy Group (MEG), Grain Belt Express Clean Line, LLC (Clean Line) and the Natural Resources Defense Council (NRDC), Sierra Club, Renew Missouri, Mid-Missouri Peaceworks and the Great Rivers Environmental Law Center (collectively, NRDC), and state as follows:

1. Ameren Missouri made its Chapter 22 Integrated Resource Plan (IRP)¹ filing on February 23, 2011.
2. On June 23, 2011, parties in this case filed pleadings alleging certain deficiencies and raising concerns regarding the compliance of Ameren Missouri's February 23 filing with applicable rule. The parties filing comments were the Staff, OPC, DNR, Clean Line, and NRDC. There were other parties to this case that did not file a report or identify any deficiencies in Ameren Missouri's IRP filing.
3. The applicable version of rule 4 CSR 240-22.080(8) in effect in February 2011 provided:

¹ Rule 4 CSR 240-22. The Commission revised its Chapter 22 rules, effective June 30, 2011. Because Ameren Missouri's 2011 IRP filing was made prior to that time, the old rules govern this process.

If the staff, public counsel or any intervenor finds deficiencies, it shall work with the electric utility and the other parties to reach, within forty-five (45) days of the date that the report or comments were submitted, a joint agreement on a plan to remedy the identified deficiencies. If full agreement cannot be reached, this should be reported to the commission through a joint filing as soon as possible, but no later than forty-five (45) days after the date on which the report or comments were submitted. The joint filing should set out in a brief narrative description those areas on which agreement cannot be reached.

4. Ameren Missouri and the parties, including parties that did not file reports raising concerns and alleging deficiencies, have not reached a joint agreement on a plan to remedy the identified alleged deficiencies and concerns.

Issues Unresolved

5. At this time, all of parties' concerns and alleged deficiencies remain unresolved.

6. Brief narrative descriptions of the parties' concerns and alleged deficiencies are attached hereto as Appendix A.

7. The applicable version of rule 4 CSR 240-22.080(9) in effect February 2011 provided:

If full agreement on remedying deficiencies is not reached, then within sixty (60) days from the date on which the staff, public counsel or any intervenor submitted a report or comments relating to the electric utility's compliance filing, the electric utility may file a response and the staff, public counsel and any intervenor may file comments in response to each other. The commission will issue an order which indicates on what items, if any, a hearing will be held and which establishes a procedural schedule.

WHEREFORE, the signatories to this Joint Filing ask the Commission to accept this pleading as fulfilling the requirements of 4 CSR 240-22.080(8).

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ *Wendy K. Tatro*

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Dated: August 8, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joint Filing was served on all parties of record via electronic mail (e-mail) on this 8th day of August, 2011.

/s/ Wendy K. Tatro

Wendy K. Tatro