

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariffs to Increase Its Annual)	<u>Case No. ER-2008-0318</u>
Revenues for Electric Service.)	Tariff Nos. YE-2008-0605

AARP's STATEMENT OF POSITIONS

COMES NOW AARP, by and through counsel, and respectfully submits the following statements of position on selected issues from the List of Issues filed previously by the Staff of the Commission ("Staff").

AARP reserves the right to revise its positions or to take a position on other issues in its briefs based upon the results of cross-examination at the hearing.

8. Fuel Adjustment Clause (FAC):

a. **FAC** – Should the Commission approve AmerenUE's proposed fuel adjustment clause, should the Commission approve a FAC with modifications for AmerenUE, or should the Commission reject the authorization of a FAC for AmerenUE.

AARP: The Commission should reject AmerenUE's request for a fuel adjustment clause (FAC) as it did in Case No. ER-2007-0002.

b. **FAC Structure** – If the Commission authorizes a FAC for AmerenUE, what are the proposals of the various parties for fuel and purchased power cost recovery pursuant to a FAC to be adopted for AmerenUE?

AARP: If the Commission chooses to shift AmerenUE's business risk onto consumers with an FAC, despite the many objections of consumers, then the Commission should adopt the OPC's alternative 50% / 50% proposal, which shares the risk and mitigates the volatility of such a surcharge.

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9. Callaway Unit II Combined Construction And Operating License Application (COLA) Costs: Should or can the costs of the combined construction and operating license application to the Nuclear Regulatory Commission for the prospective Callaway II unit be recovered in rates by AmerenUE? Can any such recovery proceed without a determination of public convenience and necessity or does AmerenUE intend to rely on the 1975 certificate?

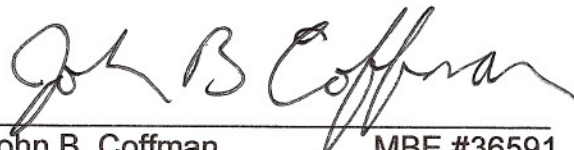
AARP: The Callaway II unit is not yet fully operational, and thus Section 393.135 RSMo. prohibits the Commission from raising electric rates to reflect these costs.

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17. Hot Weather Safety Program: Should the Hot Weather Safety Program proposed by AARP be adopted by the Commission?

AARP: Yes, the Commission should adopt the Hot Weather Safety Program to encourage low-income seniors to run their air conditioners during extreme heat advisory periods, thus reducing the risk of death and serious injury related to hyperthermia.

Respectfully submitted,

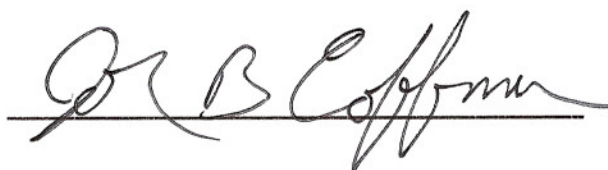


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties of record on the 13th day of November 2008:



A handwritten signature in cursive script, appearing to read "J. B. Coffman", is written over a solid horizontal line.