BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariff Establishing an Industrial)	Case No. ET-2007-0459
Demand Response Program.)	

RESPONSE OF MISSOURI ENERGY GROUP TO STAFF RECOMMENDATION

COMES NOW the Missouri Energy Group ("MEG") and hereby responds to Staff's Recommendation dated August 31, 2007 and states as follows:

- On May 31, 2007, the Commission opened a new docket, Case No. ET-2007-0459 and ordered Ameren's file a revised IDR tariff in the new docket.
- 3. On July 2, 2007, AmerenUE filed its IDR Tariff draft as an attachment to its Response of Union Electric Company d/b/a AmerenUE to Commission Order Respecting AmerenUE's Revised Industrial Demand Response Program Tariff with a proposed effective date of October 1, 2007.
- 4. On July 9, 2007, the Missouri Energy Group ("MEG") filed its Application to Intervene in this case. That Application to Intervene was granted on July 20, 2007.
- 5. On July 12, 2007, MEG filed its Response to AmerenUE's July 2 tariff filing and accompanying pleading, as amended on July 16, 2007.

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- 6. On August 1, 2007, the Commission issued an Order directing the Staff of the Missouri Public Service Commission ("Staff") to file its Recommendation to AmerenUE's July 2, 2007 filing by August 31, 2007 and directing the other parties to respond to AmerenUE's tariff and the Staff's Recommendation by September 10, 2007.
- The Staff filed its Recommendation and supporting Memorandum on August 31,
 2007.
- 8. AmerenUE's IDR tariff was filed with a 90-day effective date to allow the interested parties an opportunity to continue discussions on the appropriate parameters of the tariff. As indicated in Staff's Memorandum filed with its Recommendation on August 31 ("Memorandum"), AmerenUE, MEG, and other parties to this case have been engaged ongoing discussions in an attempt to forge an agreeable compromise to the positions of the various parties.
- 9. While the MEG agrees with the Staff concern--as stated in its Memorandum--that there may not be an AmerenUE IDR Pilot program available for the Summer of 2008 and beyond, the MEG is very concerned that an improperly designed Pilot Program will not attract participants which could give the illusion of a lack of interest in an IDR tariff, when the actual problem is that the terms of the proposed tariff will provide no or insufficient benefits and not justify interruption of operations, thus defeating the purpose of the tariff.
- 10. MEG and its consultants are willing to continue negotiations with the other parties with a goal of reaching a mutually desirable agreement for an IDR tariff and are optimistically hopeful that such agreement will be reached in time to be filed and effective by October 1, 2007.

Respectfully Submitted,

THE STOLAR PARTNERSHIP LLP

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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. ET-2007-0459 by electronic means or by U.S. mail, postage prepaid.

Dated at St. Louis, Missouri this 6th day of September, 2007

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Lisa C. Langeneckert