



January 25, 2012

Steve Reed
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Dear Mr. Reed:

I recently received a letter from Chairman Gunn dated January 17, 2012 in which the Chairman expressed concerns about the timing of Ameren Missouri's most recent notice of rate case filing, which was submitted only a few days prior to several major filings by Kansas City Power & Light Company (KCP&L), and its affiliate Kansas City Power & Light—Greater Missouri Operations. Specifically Chairman Gunn expressed concern over the possibility that Ameren Missouri's rate case and KCP&L's filings may have been timed to overwhelm the resources of the Commission Staff, the Office of the Public Counsel and any intervenors. The Chairman asked that we provide a response to you addressing the issue of communication between Ameren Missouri and any other investor-owned utility, as well as any internal communication, regarding the timing of our rate case filing.

After making a specific inquiry to all persons involved in deciding the timing of our recent rate case filing, I can state unequivocally that no such person had any discussions or other communications with employees or representatives of KCP&L or its affiliates, or any other investor-owned utility, about coordinating the timing of our filings to overwhelm other parties. Nor do we coordinate the timing of our filings for any other purpose. We do regularly communicate with KCP&L and other investor owned utilities about regulatory and legislative policy matters and issues, but coordinating the timing of regulatory filings has not been a subject of those discussions.

With regard to internal communications within Ameren Missouri, I personally participated in the discussions which led to the decision regarding the timing of Ameren Missouri's rate case and notice of rate case filings. As in our previous rate case filings, those discussions focused on the business conditions that required us to seek a rate increase, as well as the time needed to develop a revenue requirement, complete a class cost of service study, put together minimum filing requirements, develop other proposals for the filing, and assemble witnesses and testimony necessary for an

appropriate rate case filing. Another key consideration associated with the timing of our rate case filing relates to a matter that has significantly impacted our company for many years—regulatory lag. Under the current regulatory framework in Missouri, we are often forced to time our rate cases so that certain operating and capital expenditures can be included in the test year and related true-up schedules in an effort to reduce (but unfortunately, not eliminate) regulatory lag and the permanent losses associated therewith. In this case, those considerations influenced the timing of our filing as well. Finally, the timing of the rate case filing was influenced by resource constraints Ameren Missouri faced given Ameren Missouri's other proceedings at the Commission, and in the courts related to Commission proceedings on appeal. But the timing of cases to be filed by other investor-owned utilities was never given any consideration, or even mentioned, in these internal discussions.

Mr. Reed, Ameren Missouri takes very seriously the matter raised by Chairman Gunn. To be clear, Ameren Missouri did not, and would never, time one of its regulatory filings with another utility in order to overwhelm the resources of other parties to the case. Such an action would be a disservice to our customers, and contrary to the values of our company.

I hope this response helps alleviate the Chairman's concerns. Should you or Chairman Gunn have any further questions, please do not hesitate to contact me.

Sincerely,



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cc: Chairman Kevin Gunn
Lewis Mills, Public Counsel