

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

In the Matter of the Union Electric Company's)	
(d/b/a Ameren Missouri) Gas Service Tariffs)	
Removing Certain Provisions for Rebates)	<u>File No. GT-2011-0410</u>
From its Missouri Energy Efficient Natural Gas)	Tariff No. JG-2012-0620
And Building Shell Measure Rebate)	
Program)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' MOTION IN SUPPORT OF
STAFF'S MOTION TO REJECT OR SUSPEND**

COMES NOW Missouri Department of Natural Resources (MDNR), and for its Motion in Support of Staff's Motion to Reject or Suspend Tariff Filing, states as follows:

1. On June 28, 2011, the Commission issued its Order Directing Responses to the Staff of the Commission's Motion to Reject or Suspend Tariff (Staff's Motion), providing the parties to Case No. GR-2010-0363 (Ameren Missouri's last gas rate case) an opportunity to respond to Staff's Motion. MDNR was a party to GR-2010-0363 and a signatory to the Unanimous Stipulation and Agreement (filed January 4, 2011) in that case. In addition, MDNR is a member of the Ameren Energy Efficiency Advisory Group.

2. MDNR supports Staff's Motion in its entirety.

3. It is of particular concern to MDNR that Ameren Missouri is intent on withdrawing energy efficiency programs a mere six months after agreeing to "ramp up" energy efficiency programs, and before those agreed-to energy efficiency programs have even been in place for six months. These actions are not only inconsistent with the Unanimous Stipulation and Agreement approved by the Commission, but are of great concern from a policy perspective; a move in the wrong direction in terms of energy efficiency measures in Missouri.

WHEREFORE, the Missouri Department of Natural Resources respectfully submits this Motion in Support of Staff's Motion to Reject or Suspend Ameren's proposed tariff.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 29th day of June, 2011.

/s/ Sarah Mangelsdorf
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