

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

In re: Union Electric Company's	)	
2008 Utility Resource Filing pursuant to	)	Case No. EO-2007-0409
4 CSR 240 – Chapter 22.	)	

**AMERENUE'S SUGGESTIONS FOR CHANGES  
TO THE MISSOURI PUBLIC SERVICE COMMISSION'S RULES ON  
INTEGRATED RESOURCE PLANNING, FOUND AT 4 CSR 240-22, et. seq.**

**COMES NOW**, Union Electric Company, d/b/a AmerenUE (AmerenUE), and for its *Suggestions for Changes to the Missouri Public Service Commission's (Commission) rules on Integrated Resource Planning (IRP), found at 4 CSR 240-22, et. seq.*, states as follows:

1. AmerenUE made its IRP filing on February 5, 2008.
2. On or around June 18, 2008, parties in this case filed pleadings alleging certain deficiencies with AmerenUE's IRP filing.
3. On August 12, 2008, AmerenUE, 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) and the Sierra Club, Missouri Coalition for the Environment, Mid-Missouri Peaceworks and the Association of Community Organizations for Reform Now (collectively, Sierra Club) filed their *Joint Filing and Partial Stipulation and Agreement* (Partial Stipulation). This filing resolved some, but not all of the alleged deficiencies identified in the pleadings filed on or around June 18, 2008.
4. One requirement of the *Partial Stipulation* is that AmerenUE file suggestions for changes to 4 CSR 240-22.050, Demand-Side Resource Analysis.

Although the *Partial Stipulation* has not yet been approved by the Commission, AmerenUE makes this filing in fulfillment of that commitment.

5. Attached to this pleading are two exhibits. Exhibit 1 details AmerenUE's suggested changes to the Demand-Side Resource Analysis section of the Commission's IRP regulations. 4 CSR 240-22.050. Although not required to be filed by the *Partial Stipulation*, Exhibit 2 details some suggested changes to portions of the IRP regulations which deal with load building. A portion of those changes appear in 4 CSR 240-22.050, but changes are suggested for other sections of the rules as appropriate.

6. AmerenUE also proposes the Commission change 4 CSR 240-22.080(6) so that the time allowed for Staff, OPC and intervenors to file a report on the utility's IRP be reduced to sixty (60) days from the one hundred and twenty (120) days now allowed. Most of utility's IRPs are now developed using a participatory process, so it is no longer necessary for a long length of time for review of the IRP after the filing. The current rules set forth a six month process after the utility's filing (120 days for Staff/OPC/intervenors to file report, plus 45 days to resolve alleged deficiencies, plus 15 additional days to file comments on reports.) AmerenUE's requested change would reduce that time to four months (60 days to file reports, plus 45 days to resolve issues, plus 15 days to file comments on reports.)

WHEREFORE, AmerenUE respectfully requests that the Commission accept this pleading in fulfillment of paragraph 37 in the *Partial Stipulation* in this case.

Respectfully submitted,

/s/ Wendy Tatro  
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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 7<sup>th</sup> day of September, 2008.

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