

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

In the Matter of the Tariff Filings of Union)
Electric Company, d/b/a Ameren Missouri, to)
Increase Its Revenues for Retail Electric Service.) Case No. ER-2014-0258

MOTION FOR LEAVE TO FILE REVISED TRUE-UP DIRECT TESTIMONY

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and hereby requests leave to file the Revised True-Up Direct Testimony of Laura M. Moore filed concurrently herewith, and as reasons for its request, states as follows:

1. On March 17, 2015, in accordance with the Commission’s previous scheduling orders in this case, Ameren Missouri filed True-up Direct Testimony of Laura M. Moore. Ms. Moore’s True-Up Direct Testimony reflected trued-up figures including the Company’s investment through December 31, 2014 in the requested extension of its operating license for the Callaway Energy Center.

2. By notice issued March 18, 2015, the Commission requested the appearance at its Agenda session held today by any party that interpreted ¶ 6 of the *Amended Stipulation and Agreement Regarding Certain Revenue Requirement Issues* in a way that would or might preclude the Company’s inclusion of the license extension investment in rate base in this case. Representatives of the Company, the Staff, the Missouri Industrial Energy Consumers (“MIEC”), and the Office of the Public Counsel (“OPC”) appeared. MIEC and OPC contended that the above-referenced Stipulation did not allow inclusion of any investment in the Callaway license extension in rate base in this case. While the Company disagrees, the Company indicated that if MIEC’s and OPC’s disagreement jeopardized the ability to approve the above-referenced Stipulation, the Company would instead withdraw its request to include any investment in the Callaway license extension in this case.

3. In light of the foregoing, Ms. Moore has prepared revised testimony that removes from the Company's true-up figures any investment in the Callaway license extension, and is providing those revised true-up figures in replacement of those filed on March 17. This revised testimony thus is intended to replace the March 17 testimony.

4. As explained in Ms. Moore's revised testimony, the Company currently does not anticipate the need for a true-up hearing and, assuming that such a hearing will not be needed, requests that Ms. Moore's revised testimony be admitted to the record.

WHEREFORE, Ameren Missouri requests leave to file Ms. Moore's Revised True-Up Direct Testimony and to withdraw Ms. Moore's March 17 testimony, and asks that Ms. Moore's Revised True-up Direct Testimony be admitted to the record in this case.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 19th day of March, 2015.

/s/James B. Lowery
James B. Lowery