

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the First Prudence Review of
Costs Subject to the Commission-Approved Fuel
Adjustment Clause of Union Electric Company
d/b/a Ameren Missouri

)
)
) Case No. EO-2010-0255
)
)

POSITION STATEMENT OF MISSOURI ENERGY GROUP

COMES NOW the Missouri Energy Group (“MEG”), by and through undersigned
counsel, and for its Position Statement respectfully states as follows:

1. Are the revenues derived from the power sales agreements between Ameren Missouri and counter-parties Wabash Valley Power Association, Inc. (Wabash) and American Electric Power Service Corporation as Agent for the AEP Operating Companies (AEP) excluded from the definition of “OSSR” found in the Original Tariff Sheets Nos 98.2 and 98.3 of Ameren Missouri’s Fuel and Purchase Power Adjustment Clause, which took effect March 1, 2009?

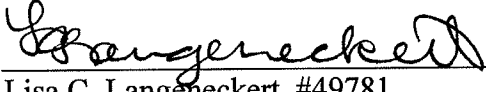
MEG POSITION: The revenues derived from the power sales agreements between Ameren Missouri and Wabash and AEP are not excluded from the definition of OSSR found in the original tariffs.

2. Was it imprudent, improper and/or unlawful for Ameren Missouri to exclude the Company’s power sale agreements with AEP and Wabash from off-system sales and not include the revenues collected under the Company’s power sale agreements with AEP and Wabash in OSSR and therefore, not include those revenues in its calculation of the Fuel and Purchased Power Adjustment rates for the time period of March 1, 2009 through September 30, 2009?

MEG POSITION: It was imprudent, improper and/or unlawful for Ameren Missouri to exclude the revenues from the Company’s power sales agreements with AEP and Wabash from off-system sales and to not include the revenues collected under the Company’s power sale

agreements in OSSR, thereby not including those revenues in its calculation of the Fuel and Purchase Power Agreement rates.

SANDBERG PHOENIX & von GONTARD P.C.

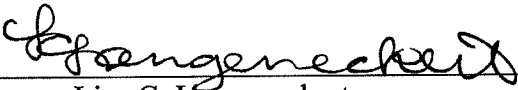
By: 
Lisa C. Langeneckert, #49781
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313
314-446-4238
314-241-7604 (Fax)
llangeneckert@sandbergphoenix.com

Attorneys for Missouri Energy Group

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 Case No. EO-2010-0255.

Dated at St. Louis, Missouri this 7th day of January, 2011.



Lisa C. Langeneckert