

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

**In the Matter of Union Electric Company, d/b/a)
AmerenUE's Tariff to Increase Its Annual) Case No. ER-2011-0028
Revenues for Electric Service)**

STATEMENT OF POSITION OF THE MISSOURI RETAILERS ASSOCIATION

COMES NOW the Missouri Retailers Association, and for its Statement of Position in the above-captioned matter states:

1. Issue 1, Overview and Policy: B. Can the Commission consider and rely on the testimony of ratepayers at local public hearings in determining just and reasonable rates? If so, how should the Commission take this testimony into account, if at all?

The Missouri Retailers Association (MRA) believes the law requires the Commission to consider and weigh all competent, material, and relevant evidence on the record. Typically, such testimony would be material and relevant to rate design, which is Issue 13B. in the list of issues in this case.

2. With respect to Issue 12, Property Taxes, MRA believes that Ameren Missouri's revenue requirement should reflect its challenge to the assessment of its distributable property, as well as the possible impacts of the assessment of the Sioux scrubbers and Taum Sauk.

3. With respect to Issue 13, Rate Design/Class Cost of Service, the MRA notes that all of the Class Costs of Service studies indicate that, as a technical matter, revenue-neutral shifts among the classes are needed to achieve cost-based rates. The MRA will quantify its position on such movement when the record evidence in this case on this issue is complete. Issue 6, Municipal Lighting, might be properly addressed under Issue 13B, Rate Design.

Having set forth its position on the issues at this time, the MRA respectfully requests the Commission to permit the MRA to assert positions on additional issues, based upon completion of the record at the evidentiary hearings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Statement of Position of the Missouri Retailers Association were sent to each of the following parties of record via electronic transmission this 22nd day of April, 2011:

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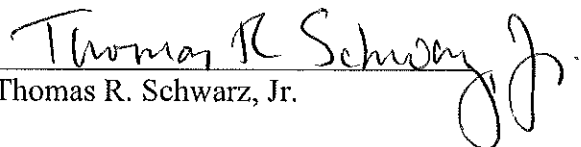
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