

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

In the Matter of the Verified Petition of	)	
Union Electric Company d/b/a AmerenUE	)	Case No. GT-2009-0413
to Change Its Infrastructure System	)	
Replacement Surcharge.	)	

**MOTION TO AMEND VERIFIED PETITION**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE” or “Company”), and for its Motion to Amend Verified Petition, respectfully states as follows:

1. On May 15, 2009, AmerenUE filed its Verified Petition to Change its Infrastructure System Replacement Surcharge with the Missouri Public Service Commission.

2. The first sentence in Paragraph 18 of the Verified Petition provides as follows:

In determining the appropriate monthly ISRS charge, the proposed rate schedule is based on a reasonable estimate of billing units in the period in which the charge will be in effect, utilizing customer class counts determined in the Rate Case.

3. In fact, the billing units used to develop the proposed rate schedule are based on customer class counts for the 12 months ending March, 2009, not those determined in the Rate Case. This method of developing the proposed rate schedule was agreed to by the Staff and the Company and is reflected in the Appendix C provided with the Verified Petition.

4. As a consequence, AmerenUE requests permission to amend its verified petition to change the first sentence in paragraph 18 to read as follows:

In determining the appropriate monthly ISRS charge, the proposed rate schedule is based on a reasonable estimate of billing units in the period in which the charge will be in effect, utilizing average customer class counts for the 12 months ended March, 2009.

WHEREFORE, AmerenUE respectfully requests that the Commission grant it authorization to amend its Verified Petition as set forth herein.

Respectfully submitted,

*Thomas M. Byrne*

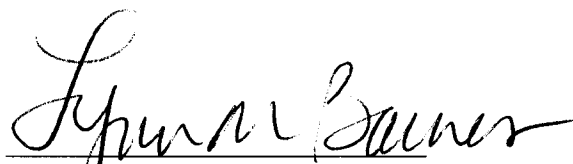
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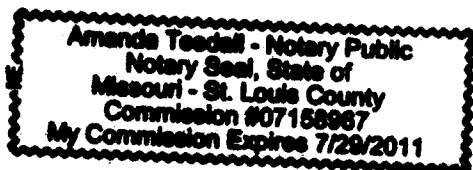
**VERIFICATION**


STATE OF MISSOURI     )  
                                  )     SS  
CITY OF ST. LOUIS     )

I, Lynn M. Barnes, being of lawful age state: that I am Vice President of Business Planning and Controller for Union Electric Company d/b/a AmerenUE; that I have read the foregoing Motion to Amend Verified Petition; that the statements and information set forth in such Motion are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of Union Electric Company d/b/a AmerenUE.

  
Lynn M. Barnes

Subscribed and sworn to before me this 22nd day of June, 2009.



  
Notary Public

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Amend Verified Petition was served on the following parties via electronic mail (e-mail) on this 22nd day of June, 2009.

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/s/ Thomas M. Byrne

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