

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

In the Matter of Union Electric Company    )  
d/b/a AmerenUE's for the Authority to File )  
Tariffs Increasing Rates for Electric        )     Case No. ER-2010-0036  
Service Provided to Customers in the        )  
Company's Missouri Service Area.            )

**STATEMENT OF POSITION**

**COMES NOW** Missouri Retailers Association (MRA), by and through counsel, and for its Statement of Position on the issues in this case states:

1. The MRA takes no position on the revenue requirement issues in this case.
2. For its position on Class Cost of Service and Rate Design issues, the MRA states:
  - a. Low-income residential customers:
    - i. Should the Commission establish a new customer class composed of very low-income residential customers? If so, how should it be defined? The MRA does not believe that Sections 393.130 and 393.140 authorize the classification or sub-classification of customers based on income.
    - ii. Should the Commission approve a program to address the concerns of AmerenUE's very low-income residential customers? The MRA supports the formulation of a program to address concerns of very low-income residential customers. It believes that the objectives, structure and evaluation of such a program should be undertaken prior to the filing of AmerenUE's next rate case.
  - b. Class Cost of Service

The MRA takes no position on the technical issues presented by the Class Cost of Service testimony that has been pre-filed in this case. The MRA does note that all such testimony indicates a decrease in revenue responsibility for the LGS customer class.

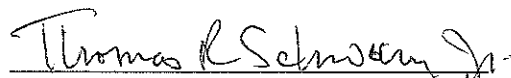
c. Rate Design

The MRA's position on rate design is that the Commission should shift revenue responsibilities away from the LGS customer class. The MRA has no position on the level of residential class or small general service class customer charges.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the above Statement of Position, were sent via electronic mail on this 10<sup>th</sup> day of March, 2010, to the following parties of record:

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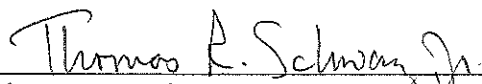
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