BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Re-Paginating Certain of Ameren Missouri's Tariff Sheets.

File No. EO-2013-

MOTION TO OPEN A NEW CASE AND ISSUE ORDER RE-PAGINATING CERTAIN OF AMEREN MISSOURI'S TARIFF SHEETS

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and states as follows:

1. On May 31, 2013, per agreement with Missouri Public Service Commission Staff (Staff), Ameren Missouri filed Mo. P.S.C. Schedule No. 6, Schedule of Rates for Electricity, which was a restatement of Ameren Missouri's electric tariff designed to supersede existing Schedule Nos. 1 (Electric Power Purchases) and 5 (Schedule of Rates for Electric Service) in their entirety. The restated tariff sheets bear an effective date of June 30, 2013.

2. Staff has requested that the new tariff include the tariff sheets that governed the operation of Ameren Missouri's fuel adjustment clause in a previous period. A prudence review for the period covered by these now-superseded fuel adjustment clause tariff sheets has not yet been completed, and Staff has indicated to Ameren Missouri that it believes it is important that these tariff sheets be included in the new tariff book because they are relevant in evaluating Ameren Missouri's prudence during the period they were in effect.

3. While Ameren Missouri does not object to re-paginating these tariff sheets and including them as part of the new tariff (Mo. P.S.C. Schedule No. 6), because they are historic tariff sheets it is not appropriate to re-file them with a new effective date, or for the Commission to re-approve them since they do not and cannot govern the operation of Ameren Missouri's fuel adjustment clause for electric service being taken by customers once the new tariff takes effect

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(on June 30, 2013) because they will have been superseded by fuel adjustment clause tariff

sheets approved in Case No. ER-2012-0166 and filed as part of the new tariff.

4. Consequently, Ameren Missouri requests that the Missouri Public Service

Commission (Commission) issue an Order simply re-paginating the following existing tariff

sheets as set forth below and requiring the tariff sheets to be included as part of Mo. P.S.C.

Schedule No. 6:

- a) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.8 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.1;
- b) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.9 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.2;
- c) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.10 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.3;
- d) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.11 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.4;
- e) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.12 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.5;
- f) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.13 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.6; and
- g) Mo. P.S.C. Schedule No. 5, 1st Revised Sheet No. 98.14 should be re-paginated as Mo. P.S.C. Schedule No. 6, Original Sheet No. 70.7.
- 5. The Staff has authorized Ameren Missouri to state that, although Staff does not

concur with every statement in this pleading, it supports the relief requested.

WHEREFORE, Ameren Missouri respectfully requests that the Commission open a new

case to address this matter and issue an order re-paginating the tariff sheets as stated above.

Respectfully Submitted,

ls/Thomas M. Byrne **Thomas M. Byrne**, #33340 Director & Assistant General Counsel 1901 Chouteau Avenue, MC 1310 P.O. Box 66149 St. Louis, MO 63166-6149 Phone (314) 554-2514 Facsimile (314) 554-4014 <u>AmerenMoService@Ameren.com</u> **ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 27th day of June, 2013.

Is Thomas M. Byrne

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