

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

In the Matter of the Suspension of Union)	
Electric Company d/b/a Ameren Missouri's)	Case No. ET-2012-_____
Rider SR - Solar Rebate Tariff.)	Tariff No. JE-2012-_____

**MOTION FOR APPROVAL OF TARIFF SHEETS
ON LESS THAN 30-DAYS NOTICE AND
MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company) and, pursuant to 4 CSR 240-2.065(2) and 4 CSR 240-2.080(16), submits its Motion for Approval of Tariff Sheets on Less Than 30-Days Notice and Motion for Expedited Treatment. In support thereof, the Company states as follows:

1. Concurrent with this filing, Ameren Missouri is filing tariff sheets reflecting a suspension of its Rider SR - Solar Rebate tariff (Schedule 5, Sheet Nos. 122.14 and 122.15). The tariff sheets being filed today are designated to be effective in 30 days (on August 14, 2011), but this Motion requests that the Commission allow them to become effective earlier for good cause shown, as it is authorized to do under Section 393.140(11), RSMo. For the reasons outlined below, good cause exists to allow the tariff sheets to become effective on July 22, 2011, or as soon thereafter as possible.

2. Rider SR implemented Section 393.1030.3 RSMo., which is the solar rebate portion of the Missouri's Renewable Energy Standard (RES) statute. However, by Judgment dated June 29, 2011, entered in consolidated Case Nos. 10AC-CC00512, 10AC-CC000513, 10AC-CC00528 and 10AC-CC00536, the Circuit Court of Cole County declared that Section 393.1030.3 is unconstitutional.

3. Consequently, after an analysis of the Judgment and applicable law, it is Ameren Missouri's belief that it is not authorized to pay solar rebates that by the terms of Rider SR it was not already obligated to pay as of the date of the Circuit Court's Judgment. Under the terms of Rider SR, Ameren Missouri was only obligated to pay those solar rebates which it has accepted. Therefore, Ameren Missouri intends to pay customers notified by the Company prior to June 29, 2011, of the approval of the solar system design submitted with their net metering application (so long as the customer otherwise meets all conditions necessary to receive payment of a solar rebate), but will not pay solar rebates to customers not so notified prior to that date.

4. Good cause exists to allow the tariff sheets being filed concurrently herewith to become effect less than 30 days after filing in order to avoid the continuing situation where customers or potential customers may believe they can apply for solar rebates, or that their pending solar system designs and net metering applications not approved by June 28 may later be approved, when in fact the statute that would have otherwise allowed the rebates to be paid has been declared unconstitutional.

5. The harm that will be avoided by allowing the tariff sheets to take effect no later than July 22, 2011, or as soon thereafter as is possible is described in paragraph 4 of this Motion. Ameren Missouri has filed this request as soon as it could after reviewing and analyzing the Circuit Court's Judgment and the applicable law. There will be no negative effect on customers or the general public in granting this expedited treatment request and, in fact, suspension of this tariff will prevent customer misunderstanding about the availability of the rebate, given the Circuit Court's Judgment.

6. Ameren Missouri did not file a 60 day notice under 4 CSR 240-4.020(2), as it does not believe this case is a contested case nor does it believe it is likely to become a contested case.

WHEREFORE, Ameren Missouri respectfully requests the Commission issue an order that allows the tariff sheets filed concurrently herewith to take effect on July 22, 2011, or as soon thereafter as possible.

Respectfully submitted,

/s/Thomas M. Byrne

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Dated: July 15, 2011

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been served via e-mail this 15th day of July, 2011, to:

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