

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

In the Matter of the Tariff Filings of Union)
Electric Company d/b/a Ameren Missouri, to) Case No. ER-2011-0028
Increase Its Revenues for Retail Electric Service.)

**MOTION FOR EXPEDITED CONSIDERATION AND APPROVAL OF
TARIFF SHEETS FILED IN COMPLIANCE WITH COMMISSION
REPORT AND ORDER ON LESS THAN THIRTY DAYS' NOTICE**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and pursuant to the Commission’s Report and Order in the above-captioned case issued July 13, 2011 (the “Report and Order”) and 4 CSR 240-2.080(16), hereby files its Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Report and Order on Less Than Thirty Days’ Notice. In support of its Motion, Ameren Missouri states as follows:

1. On July 13, 2011, the Commission issued its Report and Order in this proceeding, to be effective on July 23, 2011. Among other things, the Report and Order authorizes Ameren Missouri to file tariffs complying with the Report and Order and to do so by July 18, 2011.

Ordered ¶ 2.

2. Earlier today, Ameren Missouri caused to be filed with the Commission revised tariff sheets as authorized by the Report and Order to effectuate the decisions made by the Commission in the Report and Order. Those revised tariff sheets bear an issue date of July 18, 2011, with an effective date thirty days later in order to comply with 4 CSR 240-3.160.¹

3. Section 393.140(11), RSMo. specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after

¹ Ameren Missouri has complied with this Commission rule by filing the compliance tariffs with a thirty day effective date, despite Ameren Missouri’s belief that thirty days’ notice is unnecessary under these circumstances, particularly given the specific provisions of Section 393.140(11), discussed below.

thirty days' notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make the Company's compliance tariffs effective on or before the operation of law date in this case because the Commission has already found that Ameren Missouri is presently in a revenue deficiency position, and the Commission has already authorized the Company to file the tariffs that are filed concurrently with the filing of this Motion.

4. As provided for in 4 CSR 240-2.080(16), the Company requests that the Commission approve the compliance tariffs so that they may take effect on the operation of law date in this case (July 31, 2011), and the Commission, as noted earlier, has good cause to do so. Furthermore, the Company states that by doing so, the Commission will avoid the harm that would be caused by failing to timely allow rates determined to have been just and reasonable to take effect as soon as possible. Moreover, there can be no negative effect on anyone – ratepayers or the Company – if the compliance tariffs are approved to be effective July 31, 2011 because this will allow the rates determined by this Commission to be just and reasonable rates to in fact be charged for the electric service provided by the Company.

5. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, for the foregoing reasons and for good cause shown, Ameren Missouri respectfully requests that the Commission grant this Motion for Expedited Consideration and Approval of Tariff Sheets Filed in Compliance with Commission Report and Order On Less Than Thirty Days' Notice, and approve the tariff sheets Ameren Missouri has filed to be effective for service rendered on and after July 31, 2011.

Respectfully submitted,

/s/ James B. Lowery

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Dated : July 18, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 18th day of July, 2011.

/s/James B. Lowery_____

James B. Lowery