

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariff Establishing an Industrial)	Case No. ET-2007-0459
Demand Response Program.)	

**MISSOURI ENERGY GROUP MOTION TO
AMEND ITS JULY 12, 2007 RESPONSE
TO AMERENUE'S RESPONSE TO COMMISSION ORDER
RESPECTING AMERENUE'S REVISED
INDUSTRIAL DEMAND RESPONSE PROGRAM TARIFF**

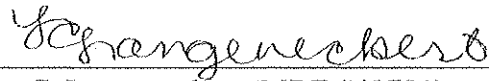
COMES NOW the Missouri Energy Group ("MEG") and respectfully submits as follows:

1. On July 2, 2007, AmerenUE filed its IDR Tariff draft as an attachment to its *Response of Union Electric Company d/b/a AmerenUE to Commission Order Respecting AmerenUE's Revised Industrial Demand Response Program Tariff*.
2. On July 12, 2007 the MEG filed its *Response to AmerenUE's Response to Commission Order Respecting AmerenUE's Revised Industrial Demand Response Program Tariff*.
3. MEG's July 12, 2007 filing inadvertently contained one factual error and one typographical error—both on page 3 of its filing. Pursuant to 4 CSR 240-2.080(20), MEG requests that its pleading be amended to correct page 3.
4. A corrected page 3 is filed with this Motion with the request that it be inserted in page of the previously filed incorrect page 3.

WHEREFORE, MEG prays that it be allowed to amend its filing and substitute the attached corrected page 3 for the previously filed page 3.

Respectfully Submitted,

THE STOLAR PARTNERSHIP LLP

A handwritten signature in cursive script, reading "L. Langeneckert", is positioned above a horizontal line.

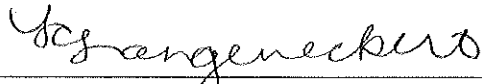
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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. ER-2007-0002 by electronic means or by U.S. mail, postage prepaid.

Dated at St. Louis, Missouri this 16th day of July, 2007



Lisa C. Langeneckert

revision is obviously not the same as that requested by MEG and it is inaccurate to characterize it as so. When referencing the notice period under revision (e), AmerenUE does provide a one-hour interruption, but the credit is so far from reasonable that, even with a one-hour notice period, the tariff is not beneficial. AmerenUE has indicated that it will perform an evaluation of the IDR pilot at the end of the pilot period as noted under revision (f) but has given no structure as to how it will perform this evaluation. In fact, AmerenUE's tariff in this case describes a **plan to develop a plan** in its 2008 Integrated Resource Plan filing, which is due before the IDR pilot is through one year of its three-year time limit. This "plan to develop a plan" is also in direct contradiction to the Commission's Order in ER-2007-0002 directing AmerenUE to "submit a revised tariff **including an evaluation plan** within 30 days from the effective date of this order."³

8. In the IDR tariff filed in this case, AmerenUE presents a tiered system and indicates that MEG did not contemplate more than one tier in the rate case.⁴ AmerenUE did not contemplate more than one tier in the rate case either. In fact, it was not until MEG had provided the IDR tariffs of three other utilities (see Exhibits 1, 2, and 3—KCPL MPOWER Rider (KS), Westar Interruptible Service Rider, and TVA Flat Price Interruptible, respectively) at AmerenUE's request, that AmerenUE offered the tiered system. While it would be reasonable to expect that a utility of AmerenUE's size and experience would review tariffs of other area utilities when devising its own if it were hoping to develop a valid tariff, AmerenUE apparently did not do that. KCPL also has an IDR tariff in Missouri (see Exhibit 4). Westar and TVA are in the process of updating their tariffs and increasing the credits, and MEG will provide those updated tariffs as soon as they are available.

³ Commission's Final Report and Order in ER-2007-0002 at 104 (emphasis added)