

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

In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Implement its Regulatory Plan.)
)
) Case No. ER-2009-0089
)

**UNION ELECTRIC COMPANY'S STATEMENT OF POSITION
AND REQUEST TO LATE-FILE**

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE"), and respectfully files its Statement of Position in the above-captioned matter, and requests leave to file the same one day out-of time. In this regard, AmerenUE states as follows:

1. The Commission's November 20, 2008 Order Setting Procedural Schedules directed the filing of statements of position in this case, with the statements due on April 15, 2009.

2. AmerenUE has not filed testimony in this case, but is participating in this case because of its direct and specific interest in some of the issues raised in this case, including the Commission's treatment of various revenue and expense items and, in particular, the Commission's examination of Kansas City Power & Light Company's ("KCPL") inclusion in rate base of air quality improvements at its Iatan Plant.

3. Given AmerenUE's somewhat limited involvement in this case, AmerenUE at this time takes no position on the issues set forth in the issue lists (filed by Staff and KCPL, respectively) herein. AmerenUE reserves its right to assert its positions on various issues when evidence is presented during the evidentiary hearings in this case, to file post-hearing briefs, to file true-up testimony, or to otherwise participate fully in further proceedings in this case.

4. AmerenUE requests leave to file this Statement one day out-of-time insofar as the undersigned counsel was out of the office (in Jefferson City addressing matters at the

Commission and otherwise) on April 15, 2009, and was unable to prepare and file this Statement until today. The undersigned counsel apologizes for any inconvenience.

Dated: April 16, 2009

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served via electronic mail (e-mail) or via regular mail on this 16th day of April, 2009, on counsel for all parties to this case:

/s/ James B. Lowery
James B. Lowery