

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

In the Matter of Union Electric )  
Company d/b/a Ameren Missouri's )  
Voluntary Green Program/Pure Power )  
Program Tariff Filing. )

Case No. EO-2013-\_\_\_\_\_  
Tariff No. JE-2013-0197

**STAFF'S MOTION TO OPEN AN INVESTIGATION CASE**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion* states:

1. On October 19, 2012, Ameren filed certain tariff sheets with the stated purpose as follows:

These sheets are filed in compliance with the Nonunanimous Stipulation and Agreement Regarding Ameren Missouri's Voluntary Green Program filed on September 20, 2012 and approved by the Commission on October 13, 2012. This tariff filing reflects the terms of the new contract between Ameren Missouri and 3 Degrees, the company contracted to provide this service to our customers.

2. These tariff sheets bear effective dates of May 1, 2013; therefore, Staff is not requesting they be suspended. However, Staff requests that the Commission open a case to investigate whether these tariff sheets should take effect.

**WHEREFORE** the Staff requests that the Commission open an investigation case.

Respectfully submitted,

**/s/ Sarah Kliethermes**

Sarah Kliethermes, MBE # 60024

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

Phone: (573) 751-6726

Fax: (573) 751-2690

E-mail: sarah.kliethermes@psc.mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to counsel for Union Electric Company d/b/a Ameren Missouri and Public Counsel this 20<sup>th</sup> day of November, 2012

**/s/ Sarah Kliethermes**