

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

In re: Union Electric Company's)	
2008 Utility Resource Filing pursuant to)	Case No. EO-2007-
4 CSR 240 – Chapter 22.)	

**MOTION TO ESTABLISH A PROCEEDING AND
REQUEST FOR WAIVERS**

COMES NOW, Union Electric Company, d/b/a AmerenUE (AmerenUE or the Company), and for its request for waivers of certain portions of the Commission's Integrated Resource Planning (IRP) rules, found in 4 CSR 240-22.010 *et. seq.*, states as follows:

1. AmerenUE made its last IRP filing on December 5, 2005 in Case No. EO-2006-0240. The resolution of this case was based upon the Stipulation and Agreement (Agreement) approved by the Missouri Public Service Commission (Commission) on February 8, 2007.
2. The terms of the Agreement include a requirement that AmerenUE file waiver requests within one month of completing the Initiation Phase of its next IRP filing, which is scheduled for February of 2008. The Initiation Phase was defined as the first two months of meetings among the parties. Those joint meetings have now occurred and so AmerenUE is filing its requested waivers.
3. Non-AmerenUE parties are required, as one of the terms of the Agreement, to file any response to a waiver request with the Commission within ten business days after the filing of the waiver request by AmerenUE.
4. AmerenUE is requesting a waiver of portions of 4 CSR 240-22.030, 4 CSR 240-22.050, 4 CSR 240-22.060 and 4 CSR 240-22.070. All of these waiver requests have been discussed with the parties to Case No. EO-2006-0240. The attachments to this Request (Attachments A, B, C and D) identify the specific portions of the rules for which AmerenUE is

requesting a waiver, the replacement suggested for those portions of the IRP rule and the rationale for each request.

5. Generally, these waiver requests do not seek complete relief from a portion of the rule without offering a replacement for that portion of the rule. In all cases, AmerenUE believes the replacement is consistent with the intent of that portion of the IRP rules and, in fact, the Company intends for the requested replacements to allow the Company to comply with the rule while improving its planning process for the February 2008 filing.

6. As the Company discussed in Case No. EO-2006-0240, the time that has elapsed since the implementation of the IRP rules has resulted in certain portions of the rule becoming outdated. It is AmerenUE's belief that these waiver requests will help achieve a better resource planning process.

WHEREFORE, AmerenUE requests the Commission establish a docket for AmerenUE's 2008 Integrated Resource Planning filing, order all interested parties from Case No. EO-2006-0240 to file their response, if any, to these requested waivers within ten business days from this filing and that the Commission approve the waiver requests as set forth in the attachments to this pleading.

Respectfully submitted,

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d/b/a AmerenUE

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Dated: April 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 19th day of April, 2007.

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