

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

In the Matter of Union Electric)	
Company d/b/a Ameren Missouri's)	<u>Case No. EO-2013-0307</u>
Voluntary Green Program/Pure Power)	Tariff No. JE-2013-0197
Program Tariff Filing.)	

AMEREN MISSOURI'S POSITION STATEMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and for its Position Statement, states as follows:

1. Should the Missouri Public Service Commission (Commission) approve Ameren Missouri's Pure Power Program tariff sheets as filed on October 19, 2012?

Yes, the Commission should approve the tariff sheets as well as the underlying contract between Ameren Missouri and 3Degrees Group, Inc. This program provides Ameren Missouri's customers with the option of purchasing Renewable Energy Credits (RECs), which support renewable generation in and around the state of Missouri. The cost of these RECs is \$10. Ameren Missouri has contracted with 3Degrees to procure RECs as well as to market and administer this program for \$10 per REC. This price is reasonable and prudent, as is demonstrated by comparison of the cost to programs offered both in Missouri and throughout the United States. As such, the Commission should approve the tariff and contract.

2. Staff's testimony sets forth conditions which it recommends be imposed upon the program, should the Commission approve the tariff. Ameren Missouri does not believe that Staff's proposed conditions improve the Pure Power program and, in fact, several of them reflect a fundamental misunderstanding of Staff's role in reviewing the prudence of this program. Staff's conditions, in general, would essentially impose

Commission regulation upon an unregulated entity and would impose conditions which are not required from any other company with which Ameren Missouri contracts for goods or services. These conditions should be rejected.

WHEREFORE, Ameren Missouri provides this Position Statement and asks the Commission to approve the Pure Power tariff and contract.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

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Corporate Counsel

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 12th day of March, 2013.

**Missouri Public Service
Commission**

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/s/ Wendy K. Tatro

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