

from the lighting class revenue requirement completely. The 5M municipalities who have been paying pole charges for pre-1988 poles have more than paid for the installation of those poles over the decades. Ameren's proposal to eliminate such charges completely, out-of-the-blue, is a virtual admission that such installation charges can no longer be justified. After that removal, the Lighting Class customers should be given the across-the board system average increase as recommended by AmerenUE. This is the only method that would fairly distribute any rate increase and not unfairly burden the municipalities which have paid in full for their pole installation costs.

Respectfully Submitted,

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

Leland B. Curtis, #20550
Carl J. Lumley, #32869
Kevin M. O'Keefe, #23381
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788 (314) 725-8789 (FAX)
Email: lcurtis@lawfirmemail.com
clumley@lawfirmemail.com
kokeefe@lawfirmemail.com
Attorneys for The Municipal Group

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was served by e-mail on counsel of record for all parties of record in this case on the attached list on the 3rd day of June, 2011.

/s/ Leland B. Curtis
