

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

In the Matter of a Working Case to Consider the)
Establishment of a Rate Stabilization) File No. AW-2013-0110
Mechanism To Reduce the Need for Frequent)
Rate Case Filings.)

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI'S RESPONSE TO ORDER
OPENING AN INVESTIGATION INTO THE ESTABLISHMENT OF A RATE
STABILIZATION MECHANISM TO REDUCE THE NEED FOR FREQUENT RATE
CASE FILINGS AND MOTION FOR
MODIFICATION OF DATE FOR THE FILING OF COMMENTS**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri") and hereby responds to the above-referenced Order and moves for a modification of the date for the filing of comments. In this regard, the Company states as follows:

1. On September 20, 2012 the Commission, *sua sponte*, issued its *Order Opening an Investigation Into the Establishment of a Rate Stabilization Mechanism to Reduce the Need for Frequent Rate Case Filings* (the "Order").

2. The Company is supportive of the Commission's efforts to examine alternatives to the historic regulatory frameworks that have been generally been employed in Missouri, and desires to prepare and submit thoughtful and constructive comments in response to the Order. As discussed below, however, in order to properly prepare such thoughtful and constructive comments the Company believes additional time is needed beyond the comment due dates set by the Order. While the Company cannot speak for other potentially interested parties (e.g., the Staff, other utilities, and other stakeholders) given the considerable press of business at the Commission since the Order was issued – and which will persist for a few more weeks (particularly given the Kansas City Power & Light Company and KCP&L-GMO rate case

hearings) – the Company believes it is likely that all potentially interested parties and ultimately the Commission itself would benefit from additional time.

3. With respect to the Company specifically, the key Company personnel, which includes its attorneys, those in charge of its regulatory matters, and senior managers and executives whose involvement in developing such comments is critical have all been substantially and largely on a full-time basis engaged in the Company’s rate case evidentiary hearings since the Order was issued. There remain additional rate case-related activities that must be completed, including regarding the true-up and briefing of the case. Such personnel also have other duties to which they must attend, some of which have been deferred during the pendency of the rate case evidentiary hearings.

4. Moreover, “rate stabilization mechanisms” could take a number of forms, and designing and implementing them can be a complex endeavor that requires care and thoughtful consideration. As earlier noted, the Company does not believe it can properly give this matter the care and thought that it deserves in the just more than two weeks remaining until the original due date for initial comments.

5. For the foregoing reasons, the Company requests that the due date for initial comments be extended to at least November 30, 2012.¹ The Company also suggests that the Commission review the initial comments and then consider the next appropriate procedural steps in this workshop docket. It may be that taking reply comments approximately 30 days later is not the most effective way to proceed in addressing and vetting various “rate stabilization” ideas that may be presented in the initial comments. Perhaps the Commission, after receiving the

¹ The Company is not clear on the Commission’s intention regarding the submission of “exhibits” in connection with the initial comments (the Order makes no mention of exhibits relating to the reply comments) but assumes the Commission does not intend to limit the documents or information that can be submitted in the workshop, regardless of the label placed on such information.

initial set of comments could give interested persons a reasonable period of time to suggest the next procedural steps in this workshop docket and could then, after considering the initial comments and those suggestions, develop a process for later receiving more formal reply comments and perhaps ultimately a workshop meeting to discuss the issues.

WHEREFORE, the Company prays that the Commission make and enter its order modifying the due date for comments in this workshop as outlined in paragraph 5 hereof, and for such other and further relief as is just and proper under the circumstances.

Dated: October 16, 2012

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 16th day of October, 2012.

/s/James B. Lowery
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