

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariff to Increase) Case No. ER-2014-0258
its Revenues for Electric Service.)

IBEW 1439's POSITION STATEMENT

Comes now International Brotherhood of Electrical Workers Local Union 1439 (IBEW 1439), through counsel, and for its Statement of Position as to the List of Issues for the above-referenced matter state as follows:

GENERAL POSITION

The Joint List of Issues filed yesterday in this matter contains numerous issues and sub-issues to be presented in this case. IBEW 1439 has no position on any of these specific issues except Issue 12, but it does have a general statement of position about the company's request for a rate increase. Ameren continues to provide excellent service at rates that are low in comparison to the rest of the nation. Ameren needs a rate increase to continue to provide top-rate service. IBEW 1439 believes maintaining service excellence is a high priority for this Commission, and should remain so. Ameren is currently at a critical point with both the size of its aging workforce and its aging infrastructure. It needs capital to address both of these issues in a manner that will insure continuation of service excellence.

Issue 12 and IBEW 1439's position on it follows.

LIST OF ISSUES

12.

- A. *Can the Commission mandate or require that the Company address its workforce needs in a particular manner and, if so, should it do so?*

Yes. This is not the first time that IBEW 1439 and/or all of the unions representing employees at Ameren (the Ameren Unions) jointly have requested the Commission allocate additional funds in a rate case to address a specific workforce need. The Commission has seen fit to allocate such funds in the past, earmarked for a specific workforce need. There is nothing extraordinary about IBEW 1439's request this time, except that its scope is more comprehensive because the issue of the aging workforce has become so critical.

B. Should the Commission require the additional reporting requested by Mr. Walters?

Yes. IBEW 1439 has requested a *special* allocation to address the aging workforce needs referred to above. Since this is a special allocation rather than a standard aspect of the rate request, the Commission is entitled to place on it any restrictions it deems prudent or necessary. IBEW 1439 believes that a special allocation to meet a special need justifies accountability that the money has been used for the purpose and in the manner for which it was allocated.

Respectfully submitted,

/s/ Sherrie A. Hall
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on February 19, 2015, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie Hall