

**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-2007-0409
4 CSR 240 – Chapter 22.)	

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 Stipulation and Agreement resolving Case No. EO-2006-0240, states as follows:

1. AmerenUE made its last IRP filing on December 5, 2005 in Case No. EO-2006-0240. The resolution of the 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. The Initiation Phase was defined as the first two months of meetings among the parties. This waiver is being filed outside of that time, so AmerenUE asks that the requirement to file waiver request within one month of completing the Initiation Phase be waived.

3. The second portion of the Agreement for which AmerenUE seeks a waiver is found within paragraph 24. Paragraph 24 reads:

AmerenUE agrees to include several alternative resource plans with and without the Callaway nuclear plant in the 2008 filing consistent with 4 CSR 240-22.060(1). AmerenUE also agrees that merely substituting an identical unit in age and cost as that of the current Callaway plant does not meet the intent of scenarios developed to address the “without Callaway” resource plans.

4. AmerenUE completed its analysis of the cost of relicensing the Callaway nuclear plant. The analysis has made it clear beyond debate that relicensing is a better option than replacing Callaway with any other type of baseload generation. Accordingly, AmerenUE has

decided it will seek an extension of the Callaway nuclear license and it no longer makes sense for AmerenUE to spend the time and effort necessary to run alternative resource plans which do not include Callaway as an available resource.

5. Given the result of this analysis, AmerenUE asks the Commission to waive the portion of the Agreement which would require it to run alternative resource plans without Callaway nuclear plant as an available resource.

6. AmerenUE has discussed this waiver with all parties in this case. The Commission Staff, Office of the Public Counsel, Missouri Energy Group, Missouri Industrial Energy Consumers and the Missouri Department of Natural Resources do not object to this waiver.

WHEREFORE, AmerenUE requests the Commission approve the waiver requests as set forth above.

Respectfully submitted,

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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 5th day of February, 2008.

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