

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

In the Matter of Union Electric Company	)		
d/b/a AmerenMoUE for Authority to File	)		
Tariffs Increasing Rates for Electric	)	Case No.	ER-2011-0028
Service Provided to Customers in the	)		
Company's Missouri Service Area.	)		

**UNIONS' POSITION STATEMENT**

COME NOW International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Union of Operating Engineers Local 148, AFL-CIO ("Unions"), by counsel, and respectfully state their position on the following issues:

The Unions support granting AmerenMo the requested rate increase, subject to restrictions and reporting requirements to insure that AmerenMo uses the additional revenue productively to insure long-term efficiency and quality of service, as follows:

1. The Unions support increasing funds to improve AmerenMo's employee infrastructure in general, including recruitment of new employees and training of its internal workforce. AmerenMo's reliance on subcontractors has reduced AmerenMo's ability to maintain its normal and sustained workload. Furthermore, investment in its permanent workforce will increase worker and customer safety.

2. The Unions support requiring AmerenMo to fully and permanently staff itself to support its normal and sustained workload. AmerenMo currently relies excessively on subcontractors, who are often less skilled and safe than AmerenMo employees and are certainly less familiar with AmerenMo equipment and processes. Permanent staffing will reduce the need for costly subcontracting and for AmerenMo's permanent employees to work excessive overtime.

3. The Unions suggest the Commission create a tracker to address the need and efforts by AmerenMo to replace its aging workforce.

4. The Unions further suggest the Commission create a tracker for AmerenMo's energy delivery distribution system in general, which will provide useful information about the relative efficiency of using the internal workforce versus contractor labor, hiring and training needs, and physical infrastructure needs.

5. The Unions further support requiring AmerenMo to invest in its physical infrastructure, specifically requiring AmerenMo to replace equipment, wires and cable which have outlived their anticipated life.

6. At this time, the Unions take no position on any other issues raised in this matter.

Respectfully submitted,

/s/ Sherrie A. Schroder  
SHERRIE A. SCHRODER, MBN 40949  
MICHAEL A. EVANS, MBN 58583  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[mevans@hstly.com](mailto:mevans@hstly.com) (email)  
[saschroder@hstly.com](mailto:saschroder@hstly.com) (email)  
Attorneys for the Unions

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on April 21, 2011, 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 A. Schroder