

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri's Filing to Implement Regulatory Changes in) File No. EO-2012-0142
Furtherance of Energy Efficiency as allowed by MEEIA.)

**AMEREN MISSOURI'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL DIRECT TESTIMONY**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, for its *Motion for Leave To File Supplemental Direct Testimony*, states as follows:

1. Ameren Missouri filed its *Application* in this case on January 20, 2012.
2. Since the filing of the *Application*, the Company has had several discussions with the Missouri Public Service Commission Staff (Staff) and others. Staff has requested additional analysis regarding the financial impact of a demand-side investment mechanism (DSIM) which can be implemented without certain variances from the Commission's Missouri Energy Efficiency Investment Act (MEEIA) rules dealing with retrospective recovery of shared net benefits. Those variances were requested in paragraph 12 A of the *Application*.
3. The Company does not believe that it is required by the Commission's rules to provide this analysis. Additionally, the Company believes it has demonstrated good cause for the requested waiver even without this analysis. However, in an effort to move past this procedural dispute, the Company has completed the requested analysis and is filing it concurrent with this pleading in the form of Supplemental Testimony by William R. Davis. Workpapers underlying the analysis discussed in Mr. Davis's Supplemental Testimony are being provided to the parties concurrently with the filing of this Motion.

4. Ameren Missouri does not believe the filing of this supplemental testimony will negatively disrupt the review process of the other parties in this case; indeed, Staff has indicated that it will reduce the work associated with their review of the Company's filing.

WHEREFORE, Ameren Missouri respectfully requests that the Missouri Public Service Commission grant it leave to file the Supplemental Testimony of William R. Davis.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, #60261
Associate General Counsel
Thomas M. Byrne, #33340
Managing Associate General Counsel
Ameren Services Company
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-2514
(314) 554-4014 (fax)
AmerenMOService@ameren.com

James B. Lowery #40503
Smith Lewis, LLP
111 S. Ninth Street, Ste. 200
P.O. Box 918
Columbia, MO 65205
Telephone: (573) 443-3141
Fax: (573) 442-6686
Email: lowery@smithlewis.com

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 17th day of February, 2012.

**General Counsel's Office
Missouri Public Service Commission**
Nathan Williams
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov
Nathan.Williams@psc.mo.gov

Office of the Public Counsel
Lewis Mills
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102-2230
opcservice@ded.mo.gov

Barnes-Jewish Hospital
Lisa Langeneckert
600 Washington Avenue, 15th Floor
St. Louis MO 63101-1313
llangeneckert@sandbergphoenix.com

**Kansas City Power & Light Company
KCP&L Greater Missouri Operations
Company**
James Fischer
101 Madison Street, Suite 400
Jefferson City MO 65101
jfischerpc@aol.com

**Kansas City Power & Light Company
KCP&L Greater Missouri Operations
Company**
Roger Steiner
P.O. Box 418679
1200 Main Street, 16th Floor
Kansas City MO 64105-9679
roger.steiner@kcpl.com

Laclede Gas Company
Michael Pendergast
Rick Zucker
720 Olive Street, Suite 1520
St. Louis MO 63101
mpendergast@lacledegas.com
rzucker@lacledegas.com

Missouri Department of Natural Resources
Frazier S Jennifer
P.O. Box 899
221 West High Street
Jefferson City MO 65102
jenny.frazier@ago.mo.gov

**Missouri Industrial Energy Consumers
(MIEC)**
Diana Vuylsteke
211 N. Broadway, Suite 3600
St. Louis MO 63102
dmvuylsteke@bryancave.com

Natural Resources Defense Council
Renew Missouri
Sierra Club
Henry Robertson
705 Olive Street, Suite 614
St. Louis MO 63101
hrobertson@greatriverslaw.org

/s/ Wendy K. Tatro

Wendy K. Tatro