

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the matter of Union Electric Company     )  
d/b/a AmerenUE's Tariffs to Increase its     )     File No. ER-2011-0028  
Annual Revenues for Electric Service.     )

**RESPONSE OF THE MUNICIPAL GROUP TO NON-UNANIMOUS  
STIPULATION AND AGREEMENT  
REGARDING CLASS COST OF SERVICE AND RATE DESIGN**

COMES NOW The Municipal Group<sup>1</sup> and in response to the above-referenced Stipulation and Agreement filed by certain parties to this case on May 12, 2011, states as follows:

1. The Office of the Public Counsel ("OPC"), the Missouri Industrial Energy Consumers ("MIEC"), AARP, the Consumers Council of Missouri ("CCM"), the Missouri Retailers Association ("MRA"), the Midwest Energy Users' Association ("MEUA") and the Missouri Energy Group ("MEG") have agreed upon and filed the above referenced Stipulation and Agreement that calls for the lighting customers to receive a larger percentage share of the rate increase sought in this case than all other customers.

2. The Municipal Group concurs with Ameren Missouri's position that an equal, across-the-board allocation of the rate increase sought in this case reflects the most appropriate rate design for its customers.

3. Therefore, pursuant to 4 CSR 240-2.115, The Municipal Group objects to the non-unanimous Stipulation and Agreement and reserves its right to cross-examine any witnesses

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<sup>1</sup> City of O'Fallon, the City of Creve Coeur, the City of University City, the City of Olivette, the City of St. Ann, the City of Kirkwood, the City of Bellefontaine Neighbors, the City of Florissant, the City of Richmond Heights, the Village of Twin Oaks, the City of Ballwin, the City of Brentwood, the Village of Riverview, the City of St. John, the City of Sunset Hills and the St. Louis County Municipal League (collectively "The Municipal Group")

who may testify to the Stipulation and Agreement, or to cross-examine any witness who may be examined by the Commission.

Respectfully Submitted,

CURTIS, HEINZ,  
GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed persons listed on the attached list on the 18th day of May, 2011.

/s/ Leland B. Curtis

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