

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

In the Matter of Union Electric Company d/b/a Ameren)	
Missouri's Tariff Filing to Implement Changes to the)	File No. GT-2011-0410
Energy Efficient Natural Gas Equipment and Building)	Tariff No. JG-2011-0620
Shell Measure Rebate Program.)	

**RESPONSE OF AMEREN MISSOURI
AS REQUIRED BY MISSOURI PUBLIC SERVICE COMMISSION ORDER**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and states as follows:

1. On June 27, 2011, the Staff of the Missouri Public Service Commission (Staff) filed its *Motion to Reject or Suspend Tariff Filings (Staff Motion)*.

2. On June 28, 2011, the Missouri Public Service Commission (Commission) issued its *Order Directing Responses to the Staff of the Commission's Motion to Reject or Suspend Tariff (Order)*. The *Order* requires Ameren Missouri to file its response to Staff's Motion by 3:00 p.m. on June 29, 2011. After the *Order* was issued, Ameren Missouri received service of Staff's *Motion*, 24 hours after it had been filed.¹ Additionally, the Office of the Public Counsel (OPC) filed its *Public Counsel's Motion to Reject Tariff Filing and Response in Support of the Staff's Motion to Reject or Suspend (OPC Motion)*.

3. Ameren Missouri disagrees with the majority of assertions and legal interpretations contained within both the *Staff Motion* and the *OPC Motion*. However, the Company does not believe it is possible for Ameren Missouri to provide the

¹ Ameren Missouri does not believe the delay in service was intentional and only points it out to demonstrate the difficulties this situation has imposed upon Ameren Missouri.

Commission with a complete response to Staff's (and now OPC's) motions in the less than 30 hours it was provided by the Commission's *Order*.

4. Two of the Ameren Missouri employees that are directly responsible for its natural gas energy efficiency programs are on vacation until July 5, 2011. That, coupled with the delayed service, makes filing a complete response by 3:00 p.m. today impossible.

5. Ameren Missouri does recognize the Commission is under a time constraint as the tariff will become effective on July 8, 2011, absent Commission action. Ameren Missouri requests the Commission order a short suspension so that the Company may have the normal 10 days to file a complete response. The Company would propose suspending the tariff until July 14, 2011 and allowing Ameren Missouri until July 8, 2011 to file its response.² The Commission may then make an informed determination of whether or not a longer suspension is justified.

WHEREFORE, Ameren Missouri files this pleading in response to the Missouri Public Service Commission's *Order*, requests the Commission allow it until July 8, 2011 to file its complete response and suspend the tariff at issue in this case until July 14, 2011.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Wendy K. Tatro

Wendy K. Tatro, # 60261
Associate General Counsel

² The 10 day response time would be July 7, 2011, but as two of the most involved individuals will not return until July 5, 2011, the Company believes an additional day would be helpful to ensure its response is complete. This one day extension of the normal response time does not disadvantage anyone.

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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 29th day of June, 2011.

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/s/ Wendy K. Tatro

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