

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

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(16) Integrated)	
Resource Planning Standard as Required by)	File No. EW-2009-0290
Section 532 of the Energy Independence and)	
Security Act of 2007.)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(17) Rate Design)	
Modifications to Promote Energy Efficiency)	File No. EW-2009-0291
Investments Standard as Required by Section)	
532 of the Energy Independence and Security)	
Act of 2007.)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(18) Consideration)	
of Smart Grid Investments Standard, and PURPA)	
Section 111(d)(19), Smart Grid Information)	File No. EW-2009-0292
Standard, as Required by Section 1307 of the)	
Energy Independence and Security Act of 2007.)	

AMERENUE’S RESPONSE TO STAFF MATRIX

COMES NOW, Union Electric Company, d/b/a AmerenUE (AmerenUE or the Company), and for its *Response to Staff Matrix*, states as follows:

1. On November 20, 2009, the Staff filed its proposed procedural matrix (Staff Matrix) containing various procedural options for Commission consideration.
2. On November 23, 2009, the Missouri Public Service Commission (Commission) issued its *Order Finding Consideration/Implementation of New Federal Standards through Workshop and Rulemaking Procedures Required*. In that order, the Commission found the prior state action exemption from the Public Utilities Regulatory Policy Act (PUPRA) inapplicable to all of the proposed standards.

3. On December 3, 2009, Commission issued its *Order Granting Request for Additional Time to Respond to Staff's Matrix*. The Commission allowed parties until December 11, 2009, to respond.

4. Staff's Matrix addressed the issue of prior state action for each standard, but as the Commission has already ruled on that question, AmerenUE will not address that aspect of Staff's Matrix.

5. Staff's Matrix lists the various mechanisms available to the Commission for considering each standard. AmerenUE has set forth its positions on each standard multiple times and so will not repeat those arguments here. Instead, AmerenUE asks the Commission to refer to the chart contained on page 5 of its October 26, 2009 pleading.

6. Staff's Matrix indicates Staff agreement with the recommendation of AmerenUE that PURPA Section 111(d)(16) (Integrated Resource Planning or IRP) be dealt with in the current IRP rulemaking workshop process. Likewise, Staff's Matrix shows, in large part, agreement with AmerenUE and other parties that PURPA Section 111(d)(17) (Rate Design for Energy Efficiency) can be handled in a separate energy efficiency docket, which Staff suggests would be the rulemaking for the implementation of the Missouri Energy Efficiency Investment Act (MEEIA).

7. For PURPA Section 111(d)(18) (Smart Grid Investment), Staff agrees in part with AmerenUE (and KCPL) that this standard could be dealt with in a separate smart grid docket.

8. Finally, for PURPA Section 111(d)(19) (Smart Grid Information), Staff's proposed action is unclear to AmerenUE. AmerenUE continues to believe the appropriate forum is in a separate smart grid docket.

WHEREFORE, AmerenUE respectfully requests that the Commission accept this pleading as its response to Staff's Matrix and that the Commission order:

(a) Consideration of the IRP planning standard (Standard 16) as part of the IRP rewrite efforts,

(b) Consideration of the Rate Design for Energy Efficiency standard (Standard 17) as part of a separate energy efficiency docket,

(c) Consideration of the Smart Grid Investment and Smart Grid Information standards (Standard 18 and 19) as part of a separate smart grid docket.

Respectfully submitted,

/s/ Wendy Tatro

Steven R. Sullivan, # 33102

Sr. Vice President, General
Counsel and Secretary

Wendy K. Tatro, # 60261

Assoc. General Counsel
Ameren Services Company
P.O. Box 66149

St. Louis, MO 63166-6149

(314) 554-3484 (phone)

(314) 554-4014 (fax)

ssullivan@ameren.com

wtatro@ameren.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Reply was served via e-mail on the following parties on the 11th day of December, 2009.

Midwest Independent Transmission System Operator, Inc. Zobrist Karl 4520 Main Street, Suite 1100 Kansas City MO 64111 816-460-2545-Ext: 816-531-7545 kzobrist@sonnenschein.com	Midwest Independent Transmission System Operator, Inc. Steiner W Roger 4520 Main Street, Suite 1100 Kansas City MO 64111 816-460-2549-Ext: 816-531-7545 rsteiner@sonnenschein.com	Missouri Department of Natural Resources Woods A Shelley P.O. Box 899 Jefferson City MO 65102-0899 573-751-8795-Ext: 573-751-8464 shelley.woods@ago.mo.gov
Missouri Energy Group Lisa C. Langeneckert 515 North Sixth Street One City Centre, 15th Floor St. Louis MO 63101 314-231-3332-Ext: 314-241-7604 llangeneckert@sandbergphoenix.com	Missouri Industrial Energy Consumers Diana M. Vuylsteke 211 N. Broadway, Suite 3600 St. Louis MO 63102 314-259-2543-Ext: 314-259-2020 dmvuylsteke@bryancave.com	Missouri Public Service Commission Steve Dottheim P.O. Box 360 200 Madison Street, Suite 800 Jefferson City MO 65102 Steve.Dottheim@psc.mo.gov
Noranda Aluminum, Inc. Department Legal P.O. Box 70 New Madrid, MO 63869 555-555-5555	Rick D. Chamberlain, JD, CPA Behrens, Taylor, Wheeler & Chamberlain 6 N.E. 63rd, Suite 400 Oklahoma City, OK 73105 Tel.: 405.848.1014 Fax: 405.848.3155 dc_law@swbell.net	Sam's East, Inc. Wal-Mart Stores East, LP Allen G. Jones Mischa Epps Buford 2555 Grand Boulevard Kansas City MO 64108 816-474-6550-Ext: 816-421-5547
James B. Lowery P.O. Box 918 111 South Ninth St., Suite 200 Columbia MO 65205-0918 573-443-3141-Ext: 573-448-6686 lowery@smithlewis.com	Sedalia Industrial Energy Users Association Praxair, Inc. David Woodsmall 428 E. Capitol Ave., Suite 300 Jefferson City MO 65101 573-635-2700-Ext: 573-635-6998 dwoodsmall@fcplaw.com	Sedalia Industrial Energy Users Association Praxair, Inc. Stuart Conrad 3100 Broadway, Suite 1209 Kansas City MO 64111 816-753-1122-Ext: 816-756-0373 stucon@fcplaw.com

Southwest Power Pool, Inc.
David C. Linton
424 Summer Top Lane
Fenton MO 63026
636-349-9028-Ext:
636-349-9028
djlinton@charter.net