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 Its)	File No. ET-2012-
Business Electric Energy Efficiency Programs.)	

Request for Approval of Business Electric Energy Efficiency Bridge Tariffs

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) and, for its Request for Approval of Business Electric Energy Efficiency Bridge Tariffs, states as follows.

- 1. On July 8, 2011, Ameren Missouri filed a 60 day notice, indicating it would be filing for a revision of its electric energy efficiency programs. The notice was for all of its electric energy efficiency programs, residential and business.
- 2. Concurrent with the filing of this pleading, the Company is filing new business energy efficiency program tariffs. It has previously filed its new residential energy efficiency program tariffs in File No. ET-2012-0011.
- 3. The tariffs filed today are designed to bridge the gap between the expiration of the Company's former energy efficiency programs (which expired on September 30, 2011) and when the Commission issues an order on the Company's Missouri Energy Efficiency Investment Act (MEEIA) filing.
- 4. The Company hopes to make its MEEIA filing during the first quarter of 2012. That filing will present the Commission with the regulatory framework necessary to value demand-side investments equal to traditional investments in supply and delivery infrastructure so that Ameren Missouri may continue to pursue energy efficiency.

5. The bridge programs are designed to continue to offer energy efficiency benefits to customers and maintain a sufficient portion of the Company's energy efficiency infrastructure so that implementation of its programs after the MEEIA filing is not unduly delayed while addressing the very real negative impact of the throughput disincentive upon the Company, as was acknowledged in the Commission's Report and Order in Case No. ER-2011-0028.

WHEREFORE, for the reasons detailed above, Ameren Missouri respectfully requests the Commission approve the Company's business energy efficiency bridge tariffs filed concurrent with this pleading.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

Is 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

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 18th day of November, 2011.

General Counsel's Office Missouri Public Service Commission P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, Missouri 65102 gencounsel@psc.mo.gov Office of the Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102-2230 opcservice@ded.mo.gov

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

Mary Ann Young
Missouri Department of Natural Resources
1101 Riverside Drive,
4th Floor East, Rm. 456
Lewis & Clark State Office Building, 4E
Jefferson City, MO 65109-0176
Maryann.young@dnr.mo.gov

<u>|s| Wendy X. 7atro</u> Wendy K. Tatro