

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company)	
d/b/a AmerenUE's Tariffs to Increase)	Case No. ER-2010-0036
its Annual Revenues for Electric Service.)	

STATEMENT OF POSITION OF THE MUNICIPAL GROUP

COMES NOW the City of O'Fallon, the City of University City, the City of Rock Hill and the St. Louis County Municipal League (collectively "The Municipal Group") and submits their Statement of Position in response to the List of Issues, Order of Witnesses, Order of Opening Statements and Order of Cross Examination filed March 8, 2010:

1. The Municipal Group takes no position on the revenue requirement issues in this case.
2. For its position on Class Costs of Services and Rate Design issues, The Municipal Group states:
 - b. Class Cost of Service:
 - i) Ameren should immediately commence a cost of service study for all rates under 5M and 6M, and upon completion Ameren should share the results, all work papers and underlying data with financial and accounting consultants for the Municipal Group and the Staff of the Missouri Public Service Commission. Prior to commencing such study Ameren should meet with the Municipal Group's financial and accounting consultants and those at the Missouri Public Service Commission and reach agreement on the parameters and general guidelines for the study.
 - ii) Ameren should develop a methodology for determining the value of systems within municipal boundaries and negotiate in good faith with any 5M municipal streetlighting customer who wishes to purchase or take ownership of any streetlight systems within its jurisdictional boundaries, subject to final approval by the Missouri Public Service Commission.
 - c. Rate Design
 - i) There should not be any rate increase for streetlighting rates under 5M and 6M categories.

- ii) The 10% discount on all streetlighting bills made by Ameren to Municipalities should be increased to 20%.
- iii) The pole rental charges to the municipalities should be discontinued. To insure accurate billing, Ameren will develop a data base to insure that municipalities are informed of the location of poles within their boundaries, by type, etc. and that municipalities will only be charged for facilities within their boundaries.

Respectfully Submitted,

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

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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 12th day of March, 2010.

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