

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a AmerenUE's Tarriffs to Increase Its Annual Revenue for Electric Service)
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)
) Case No. ER-2010-0036
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MISSOURI ENERGY GROUP
TEST YEAR AND TRUE-UP RECOMMENDATIONS AND
INITIAL RESPONSE TO REQUEST FOR INTERIM RATE INCREASE

COMES NOW the Missouri Energy Group ("MEG") and pursuant to the Public Service Commission's Orders dated July 27, 2009 and July 30, 2009 directing filings states as follows:

1. MEG does not object to the test year submitted by AmerenUE ("Company").

MEG does not take a position on the necessity for a true-up hearing at this time.

2. The standard for interim rate relief is high and has been previously determined by the Commission in *In re Missouri Public Service Company*, Case No. 18,502, 20 Mo. P.S.C. (N.S.) 244 (1975). As stated by the Commission in its "Order Rejecting Tariff and Granting Motion to Dismiss" in the Empire District Interim Rate Request No. ER-2002-425:

According to the *Missouri Public Service* case, to be eligible for interim rate relief a utility company must show that: (1) it needs the additional funds immediately, (2) that the need cannot be postponed, and (3) that no other alternatives exist to meet the need but rate relief. The Commission has, however, granted interim rate relief on a nonemergency basis where the Commission found that particular circumstances necessitated such relief. The Western District Court of Appeals has also held that it is possible to grant interim rate relief on a nonemergency basis. The Commission has traditionally, however, followed the emergency standard.

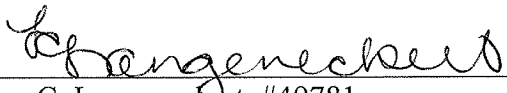
[footnote references omitted]

MEG does not believe that a company that was awarded a fuel adjustment clause and a 10.76 percent return on equity in its most recent rate case that ended less than six months prior to

this filing meets the high standard that this Commission has historically required to grant an interim rate increase. If those generous awards mere months ago allow for regulatory lag sufficient to allow an interim rate increase, then it will be a rare utility in Missouri that will not qualify for an interim rate increase. If this Commission determines that an interim rate increase is appropriate, AmerenUE's shifting of risk should be reflected by an appropriate downward adjustment in its allowed rate of return in this case.

WHEREFORE, MEG prays that the Commission will accept this test year and true-up recommendations and maintain its own high standard of granting interim rate relief in only the most extreme circumstances.

SANDBERG PHOENIX & von GONTARD P.C.

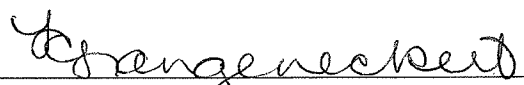
By: 
Lisa C. Langeneckert, #49781
515 North Sixth Street, #1500
St. Louis, MO 63101-1880
314-446-4238
314-241-7604 (Fax)
E-mail: llangeneckert@sandbergphoenix.com

Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. ER-2010-0036.

Dated at St. Louis, Missouri this 27th day of August, 2009


Lisa C. Langeneckert