

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

In re: Union Electric Company's)	
2008 Utility Resource Filing pursuant to)	Case No. EO-2007-0409
4 CSR 240 – Chapter 22.)	

**FILING DEMONSTRATING COMPLIANCE WITH THE
COMMISSION APPROVED STIPULATION AND AGREEMENT
FROM CASE NO. EO-2006-0240**

COMES NOW, Union Electric Company, d/b/a AmerenUE (AmerenUE or the Company), and for its Filing Demonstrating Compliance with the Commission Approved Stipulation and Agreement from Case No. EO-2006-0240, states as follows:

1. AmerenUE made its last IRP filing on December 5, 2005 in Case No. EO-2006-0240. The resolution of this case was based upon the Stipulation and Agreement (Agreement) approved by the Missouri Public Service Commission (Commission) on February 8, 2007.

2. The terms of the Agreement were extensive and included participation by the intervenors in Case No. EO-2006-0240 (often referred to as Stakeholders) in AmerenUE's next IRP planning process.

3. Exhibit 1 to this pleading demonstrates AmerenUE's compliance with the terms of the Agreement. The exhibit references the portions of the current IRP filing as is responsive to the requirements of the Agreement where appropriate. Demonstrating compliance for some terms of the Agreement cannot be found within IPR filing. For those items, the exhibit sets forth an explanation how AmerenUE fulfilled and, in several instances, exceeded the requirements of the Agreement.

4. An overarching philosophy governing AmerenUE's actions while developing the current IRP plan was one that sought to encourage Stakeholder participation. Allowing some stakeholder participation was a requirement of the Agreement, but AmerenUE believes it went

well beyond the minimal level prescribed in the Agreement. The Agreement required a minimum of eight meetings and six conference calls between AmerenUE and the Stakeholders. The process that occurred ultimately included almost 30 meetings and conference calls. That number, of course, does not include the too-numerous-to-count email exchanges and telephone calls which occurred between AmerenUE and various Stakeholders as the process unfolded. Additionally, at the times that AmerenUE and the Stakeholders were discussing demand-side management programs, the Company brought in additional, outside parties, including individuals representing the Metropolitan Urban League and the Human Development Corporation. The purpose of this was to broaden the viewpoints under consideration and to ensure AmerenUE and the Stakeholders had an understanding of the impact of this planning process upon the Company's customers.

5. The philosophy of inclusion was extended to efforts which involved the public in this effort. The Agreement required AmerenUE to work with the Stakeholders to develop a process to provide the public an opportunity for input. This is another area of the Agreement where AmerenUE feels it went well beyond the minimal requirement of the Agreement. In October of 2007, the Stakeholders joined AmerenUE in conducting three well-publicized workshops in St. Louis, Cape Girardeau and Jefferson City to gather public comment on energy efficiency and energy management programs. AmerenUE is pleased to note that more than 200 citizens attended these programs and many offered comments which helped shape the two dozen initiatives selected by the IRP plan. This extra effort resulted in additional, helpful information which was used in the development of the IRP plan.

6. Consistent with the participatory and open nature of this process, within days after the IRP filing was made in this case, AmerenUE ensured that every Stakeholder was provided a disc which contained all workpapers supporting the filed IRP plan. AmerenUE also held

meetings after the filing to walk through the filing, answer questions and to generally assist the Stakeholders in navigating the large and complicated filing.

7. Another major difference from its 2005 IRP filing, the current IRP plan itself clearly treats demand-side resources in a manner similar to supply-side resources. Outside of the IPC process, the Company has and continues to demonstrate its commitment to demand-side resources. Since the last IRP filing, AmerenUE has reorganized and now has a Vice President who is in charge of demand-side program implementation. Beyond the existing employees who work in this area, AmerenUE is creating six new positions to manage implementation of its energy efficiency and demand response programs. Senior Program Managers for mass markets (residential and small commercial) and business-to-business (large commercial and industrial) should be in place by May 31, 2008, with a selection processes for the other positions commencing thereafter. AmerenUE hopes the Stakeholders, as well as the Commission, is able to identify the very real commitment the Company has made to demand-side resources.

8. The AmerenUE demand-side implementation plan includes a robust combination of demand response, energy efficiency and low-income programs. The implementation of these programs will occur over a three year implementation period beginning on June 1, 2008 and extending through May 31, 2011. AmerenUE believes the program mix identified within the IRP plan will result in very real energy and demand savings. The chart below summarizes these savings and costs that are estimated for this period.

	2008	2009	2010
Estimated energy savings (MWh)	61,918	123,835	269,185
Estimated demand reduction (MW)	53	106	131
Estimated costs (Program costs only)	\$13 M	\$24.5 M	\$31.9 M

9. AmerenUE believes that it is in full compliance with the Agreement. The Company did file for a waiver of one provision of the Agreement; the portion which required

AmerenUE to "...include several alternative plans with and without the Callaway nuclear plant in the 2008 filing consistent with 4 CSR 240-22.060(1)." After completing its analysis of the cost of relicensing the Callaway nuclear plant, AmerenUE felt it was clear that relicensing is a better option than replacing the Callaway nuclear plant with any other type of baseload generation. On February 5, 2008, AmerenUE asked for permission not to complete this portion of the Agreement. No party objected to this request.

10. Overall, AmerenUE feels this process has been a very positive one and is very proud of the efforts put into the development of the IRP plan as well as of the plan itself. The Company would like to take this opportunity to publicly thank all of the parties who devoted significant amounts of their time to work on this process with the Company. AmerenUE believes that both the process and the outcome were improved because of their efforts.

WHEREFORE, AmerenUE submits the attached Exhibit 1 as demonstration of its compliance with the Stipulation and Agreement approved by the Commission in Case No. EO-2006-0240 and asks that the Commission accept this filing.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of May, 2008.

/s/ Wendy K. Tatro

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