

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Voluntary Green)
Program/Pure Power Program Tariff)
Filing.)

Case No. EO-2013-0307
Tariff No. JE-2013-0197

**STATEMENT OF POSITION OF THE OFFICE OF THE PUBLIC COUNSEL
AND MOTION FOR LEAVE TO LATE FILE**

COMES NOW the Office of the Public Counsel and for its Statement of Positions and Motion for Leave to Late File states as follows:

Issue and Position:

Should the Commission approve Ameren Missouri's Pure Power Program tariff sheets as filed on October 19, 2012?

Public Counsel supports the position of the Staff of the Commission.

Motion for Leave to Late File

By its order issued March 11, the Commission extended the deadline for filing Statements of Position until March 12. Because of issues with a home computer, the undersigned was unable to file this Statement of Position on the evening of March 12. Because the Statement of Position is being filed only one day out of time and because the hearing is still six days away, neither the parties nor the Commission will be harmed by its late filing.

WHEREFORE, Public Counsel respectfully submits this Statement of Position and requests leave to file it one day out of time.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ **Lewis R. Mills, Jr.**

By: _____

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I hereby certify that a copy of the foregoing has been emailed to parties of record this 13th day of March 2013.

Missouri Public Service Commission

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/s/ **Lewis R. Mills, Jr.**
