

**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.)	

**STAFF RESPONSE TO UNION ELECTRIC COMPANY
d/b/a AMERENUE'S REQUEST FOR WAIVERS**

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the April 19, 2007 filing of Union Electric Company, d/b/a AmerenUE (AmerenUE) entitled "Motion To Establish A Proceeding And Request For Waivers" and the Missouri Public Service Commission's (Commission) April 20, 2007 Order Adding Parties, Providing Notice, And Directing Response. In response the Staff states it has no objection to AmerenUE's Motion To Establish A Proceeding And Request For Waivers. As a signatory party to the Nonunanimous Stipulation And Agreement filed in Case No. EO-2006-0240 on January 5, 2007, subsequently approved by the Commission in an Order issued on February 8, 2007, the Staff agreed to file a response with the Commission to AmerenUE's waiver requests within ten (10) business days of AmerenUE's waiver request filing. The Staff also notes the variance provision 4 CSR 240-22.080(11).

Although the Staff has no objection to the waivers requested by AmerenUE, the Staff recommends that the Commission make clear in its Order that its approval of AmerenUE's request, if it approves AmerenUE's request, is a one time authorization applicable solely to AmerenUE and the 4 CSR 240-Chapter 22 Rules themselves are not in any manner affected. Also, the Staff wants to be very clear that its lack of objection to AmerenUE's April 19, 2007 filing is solely in regard to that filing and should not be

taken as concurrence or acquiescence regarding language that might be proposed in the future in a rulemaking to consider the 4 CSR 240-Chapter 22 Rules or any other filing or proceeding that might occur respecting these rules.

Wherefore, the Staff files its response to AmerenUE's April 19, 2007 request for waivers.

Respectfully submitted,

/s/Steven Dottheim

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 3rd day of May 2007.

/s/ Steven Dottheim