

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

In the Matter of Ameren Missouri's Renewable)
Energy Standard Compliance Plan.) Case No.

REQUEST FOR WAIVER

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri or the Company), and for its request for a waiver of a portion of the Commission's Renewable Energy Standard rules, found in 4 CSR 240-20.100(7)(B)1F, states as follows:

1. Concurrent with this Request for Waiver, Ameren Missouri is filing its Renewable Energy Standard (RES) Compliance Plan (Compliance Plan), as required by 4 CSR 240-20.100(7).

2. 4 CSR 240-20.100(7)(B)1F requires the Compliance Plan to provide a "...detailed explanation of RES retail impact limit calculated in accordance with section (5) of this rule."

3. Section (5) of the rule requires a highly detailed calculation of a revenue requirement which excludes renewable energy sources and includes costs associated with greenhouse gas costs. The impact of these adjustments is that the calculation, by design, produces a larger revenue requirement than the Company's last Commission approved revenue requirement.

4. Ameren Missouri's cost to comply with the RES for this year and the next two calendar years is significantly less than 1% of its current revenue requirement. Accordingly, the extra calculations are not necessary to ensure Ameren Missouri's

compliance plan is obtainable within the statutory expenditure cap for 2011, 2012 and 2013.

5. Ameren Missouri requests the Missouri Public Service Commission (Commission) grant it a waiver of 4 CSR 240-20.100(7)(B)1F and, instead, allow the Company to demonstrate that the costs of RES compliance is less than 1% of its last Commission ordered revenue requirement.

WHEREFORE, AmerenUE requests the Commission grant it a waiver of 4 CSR 240-20.100(7)(B)1F and, instead, allow Ameren Missouri to demonstrate that the expenditures necessary to comply in 2011, 2012 and 2013 are less than 1% of its last Commission approved revenue requirement.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 15th day of April, 2011, to the following:

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