

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Permission and)	
Approval and a Certificate of Public)	
Convenience and Necessity Authorizing)	
it to Construct, Install, Own,)	File No. EA-2012-0281
Operate, Maintain, and Otherwise Control and Manage)	
A Utility Waste Landfill and Related Facilities at its)	
Labadie Energy Center.)	

**AMEREN MISSOURI'S MOTION FOR CLARIFICATION OF ORDER REGARDING
OBJECTIONS AND MOTION TO STRIKE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and hereby seeks clarification with respect to one Exhibit that was the subject of its Objections and Motion to Strike, but which was not addressed in the Commission's *Order Regarding Objections and Motion to Strike* (the "Order"). In this regard, Ameren Missouri states as follows:

1. The Order sustained Ameren Missouri's objection on hearsay grounds to the newspaper articles contained Exhibit I, including a St. Louis Post-Dispatch article entitled *Leaks from the Ameren Toxic Waste Pond in Labadie Stirs Fears*.

2. That same article was submitted as Exhibit M. Ameren objected to Exhibit M on the same bases as its objections to Exhibit I, including on hearsay grounds, at page 16 in footnote 16 of its original Objections and Motion to Strike. The Commission appears to have overlooked the objection to Exhibit M, perhaps because it was addressed in a footnote.

3. For the reasons given in the Order, Exhibit M is inadmissible hearsay. Ameren Missouri's objection thereto should be sustained and it too should be ordered stricken from the record.

WHEREFORE, Ameren Missouri prays that the Commission make and enter and order Order clarifying that its objection on hearsay grounds to Exhibit M is sustained, and that Exhibit M is stricken from the record.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery MBN#40503

Michael R. Tripp MBN#41535

Smith Lewis, LLP

111 S. Ninth Street, Ste. 200

P.O. Box 918

Columbia, MO 65205

Telephone: (573) 443-3141

Fax: (573) 442-6686

Email: lowery@smithlewis.com

tripp@smithlewis.com

Thomas M. Byrne MBN#33340

Director - Assistant General Counsel

Ameren Services Company

1901 Chouteau Ave.

P.O. Box 66149

St. Louis, MO 63166-6149

Telephone: (314) 554-2514

Facsimile: (314) 554-4014

E-Mail: AmerenMOService@ameren.com

**ATTORNEYS FOR
UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via e-mail to the following on August 28, 2013:

Nathan Williams
Jennifer Hernandez
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360
staffcounsel@psc.mo.gov

Lewis R. Mills
Missouri Office of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102-2230
opcservice@ded.mo.gov

Elizabeth J. Hubertz
Maxine I. Lipeles
Interdisciplinary Environmental Clinic at
Washington University School of Law
1 Brookings Drive, Campus Box 1120
St. Louis, MO 63130
ejhubertz@wulaw.wustl.edu
milipele@wulaw.wustl.edu

/s/ James B. Lowery
James B. Lowery