## **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, Operate, Maintain and Otherwise Control and Manage a Utility Waste Landfill and Related Facilities at its Labadie Energy Center.

Case No. EA-2012-0281

## PUBLIC COUNSEL'S STATEMENT OF POSITIONS

COMES NOW the Office of the Public Counsel and for its Statement of Positions states

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as follows:

1. Does the evidence establish that the utility waste landfill for which Ameren Missouri

is seeking a certificate of convenience and necessity ("CCN") is necessary or convenient for

the public service?

Public Counsel's position: Public Counsel supports the position of the Staff.

2. If the Commission decides to grant the CCN, what conditions, if any, should the

Commission impose?

Public Counsel's position: Public Counsel supports the position of the Staff.

WHEREFORE, Public Counsel respectfully submits its Statement of Positions.

OFFICE OF THE PUBLIC COUNSEL

By: <u>/s/ Lewis R. Mills</u> Lewis R. Mills (#35275) Public Counsel P O Box 2230 Jefferson City, MO 65102 (573) 751-1304 (573) 751-5562 FAX lewis.mills@ded.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was mailed, electronically, to parties of record this 21<sup>st</sup> day of March, 2014.