

**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 the Issuance)
Of an Accounting Authority Order Relating to its) **File No. EU-2012-0027**
Electrical Operations.)

Position Statement of Barnes-Jewish Hospital

Issue 1: Do the amounts at issue in this case constitute “fixed costs” or “lost revenues / profits”?

BJH Position: Lost revenues/profits. Ameren’s fixed costs did not change.

Issue 2: Should the Commission issue an Accounting Authority Order (“AAO”) authorizing Ameren Missouri to defer and record to the Uniform System of Accounts, account 182.3, Other Regulatory Assets, the “fixed costs” / “lost revenues / profits” which Ameren Missouri was unable to recover due to the effect on Noranda’s load of the January 27, 2009 ice storm.

Position: No AAO should be issued.

Issue 3: Should Ameren Missouri be permitted to amortize these “fixed costs” / “lost revenues or profits” over a reasonable period commencing with the effective date of the rates approved in Ameren Missouri’s pending rate case (Case No. ER-2012-0166) or over a period commencing close in time to the January 2009 ice storm?

Position: No amortization should be allowed, inasmuch as the amounts should not be recovered from retail ratepayers. In the event that the Commission allows any amortization, it should also recognize the extraordinary nature of this request and mitigate the impact on ratepayers.

Issue 4: What is the correct quantification of the “fixed costs” / “lost revenues / profits” which Ameren Missouri was unable to recover due to the effect on Noranda’s load of the January 27, 2009 ice storm?

Position: The correct quantification is that of Staff’s witness, Mr. Carter.

Issue 5: Would the recovery in a subsequent rate case of any amounts deferred pursuant to the AAO proposed by Ameren Missouri constitute unlawful retroactive ratemaking when effectuated in ratemaking?

Position: Yes. Under the circumstances here, including the fact that the Commission has already ruled on the substance of Ameren’s request—and denied the request—this would be retroactive ratemaking.

SANDBERG PHOENIX & von GONTARD P.C.

By: /s/Lisa C. Langeneckert
Lisa C. Langeneckert, #49781
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313
314-446-4238
314-241-7604 (Fax)
E-mail: llangeneckert@sandbergphoenix.com

Attorneys for Barnes-Jewish Hospital

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. EU-2012-0027.

Dated at St. Louis, Missouri this 19th day of April, 2012.

/s/Lisa C. Langeneckert

Lisa C. Langeneckert