

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

In the Matter of Staff's Audit of Union Electric)
Company d/b/a Ameren Missouri's)
Construction of Pollution Control Equipment at)
its Labadie Energy Center.)
)
)

Case No. EO-2014-_____

MOTION TO OPEN CASE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Motion to Open Case* states as follows:

1. Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") owns and operates the Labadie Energy Center ("Labadie").
2. Ameren Missouri is constructing Pollution Control Equipment at Labadie.
3. Based on information available to date, the planned and ongoing construction of Pollution Control Equipment at Labadie includes, but may not be limited to:
 - a. A new electrostatic precipitator for Unit 1,
 - b. A new electrostatic precipitator for Unit 2,
 - c. Refurbishment of an electrostatic precipitator for Unit 3,
 - d. Refurbishment of an electrostatic precipitator for Unit 4,
 - e. Ductwork,
 - f. Supporting steel, and
 - g. Other auxiliary equipment.
4. Staff requests that the Commission open this case to facilitate and retain discovery related to Staff's audit of the Labadie Pollution Control Equipment.
5. Staff anticipates that any disputes related to the level of Ameren Missouri's prudent investment in the Labadie Pollution Control Equipment would be

made in the general rate case where Ameren Missouri seeks to include its costs of the Labadie Pollution Control Equipment in rate base, and not in this case.

WHEREFORE, Staff respectfully requests that the Commission open a case to facilitate and retain discovery related to Staff's audit of Ameren Missouri's construction of Pollution Control Equipment at the Labadie Energy Center.

Respectfully submitted,

/s/ Sarah Kliethermes

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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 10th day of September, 2013.

/s/ Sarah Kliethermes