

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

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| In re: Union Electric Company's |) | |
| 2005 Utility Resource Filing pursuant to |) | Case No. EO-2006-0240 |
| 4 CSR 240 – Chapter 22 |) | |

**MOTION FOR COMMISSION APPROVAL OF NON-UNANIMOUS
STIPULATION AND AGREEMENT AND REQUEST TO SUSPEND
PROCEDURAL SCHEDULE**

COME NOW Union Electric Company, d/b/a AmerenUE (AmerenUE), the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), the Missouri Department of Natural Resources (DNR), Missouri Industrial Energy Consumers (MIEC) and the Sierra Club, Missouri Coalition for the Environment, Mid-Missouri Peaceworks and the Association of Community Organizations for Reform Now (collectively, the Sierra Club) and for their Motion for Commission Approval of Non-Unanimous Stipulation and Agreement and Request to Suspend Procedural Schedule, state as follows:

1. On November 9, 2006, the Missouri Public Service Commission (Commission) issued its Order Adopting Procedural Schedule. On December 4, 2006, AmerenUE filed the Direct Testimony of Michael L. Moehn, as required by the Procedural Schedule.

2. All parties in this case have engaged in and continued settlement discussions. Attached to this pleading is the agreement reached as a result of these discussions, Titled Non-Unanimous Stipulation and Agreement (Agreement). The Agreement resolves all issues among the signatory parties in this case. All parties, with

the exception of the Missouri Energy Group (MEG) and Noranda Aluminum, Inc. (Noranda) have signed this Agreement. MEG has indicated to AmerenUE that it has no objection to the Agreement. Noranda has indicated that it will file a statement setting forth its position on the Agreement in a separate pleading.

3. The Agreement will result in AmerenUE making its next Chapter 22 Electric Utility Resource Planning / Integrated Resource Plan (IRP) filing on February 5, 2008, instead of December 5, 2008. It also specifies a participatory process which will be followed during the development of AmerenUE's February 5, 2008 IRP filing. This process will be open to all intervenors in the case, regardless of whether or not the party is a signatory to the Agreement.

4. The signatory parties request the Commission approve the attached Non-Uniform Stipulation and Agreement.

5. The parties respectfully request that the Commission immediately suspend the Procedural Schedule in this case. MEG and Noranda have indicated to AmerenUE that they have no objection to a suspension of the procedural schedule.

WHEREFORE, AmerenUE, Staff, OPC, DNR, MIEC and the Sierra Club ask the Commission to approve the attached Non-Uniform Stipulation and Agreement as a full and final resolution of all alleged deficiencies of AmerenUE's December 5, 2005, Electric Utility Resource Planning / IRP filing.

Respectfully submitted,

/s/ Thomas M. Byrne
Steven R. Sullivan, #33102
Sr. Vice President, General
Counsel and Secretary

/s/ Steven Dottheim
Steven Dottheim
Chief Deputy General Counsel
Mo. Bar No. 29149

Thomas M. Byrne, #33340
Managing Associate General Counsel

Ameren Services Company
1901 Chouteau Avenue (MC 1310)
St. Louis, MO 63103
PO Box 66149 (MC 1310)
St. Louis, MO 63166-6149
314-554-2514 (Voice)
314-554-4014 (Fax)
ssullivan@ameren.com
tbyrne@ameren.com

Attorney for Staff of the
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-360
573-751-7489 (Voice)
573-751-9285 (Fax)
steve.dottheim@psc.mo.gov

OFFICE OF THE PUBLIC COUNSEL

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

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon
Attorney General

Shelley A. Woods
Assistant Attorney General

/s/ Shelley Woods
Shelley A. Woods
Missouri Attorney General's Office
P.O.Box 899
Jefferson City, MO 65102
573.751.8464 (fax)
573.751.8795
shelley.woods@ago.mo.gov

SIERRA CLUB, *et. al.*

/s/ Henry B. Robertson
Henry B. Robertson (Mo. Bar No. 29502)

Kathleen G. Henry (Mo. Bar No. 39504)
Bruce A. Morrison (Mo. Bar No. 38359)
Great Rivers Environmental Law Center
705 Olive Street, Suite 614
St. Louis, Missouri 63101
(314) 231-4181
(314) 231-4184
khenry@greatriverslaw.org
hrobertson@greatriverslaw.org

BRYAN CAVE, LLP

/s/ Diana Vuylsteke
Diana Vuylsteke
211 Broadway, Suite 3600
St. Louis, Missouri. 63102
Telephone: (314) 259-2100
Facsimile: (314) 259-2020
Email: dmvuylsteke@bryancave.com

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 5th day of January 2007.

/s/ Wendy Tatro