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AmerenUE's Response to
State of MO - Atty General Data Request
MPSC Case No. ER-2007-0002
AmerenUE's Tariff Filing to Increase Rates for Electric Service
Provided to Customers in the Company's Missouri Service Area

Missouri Public
Service Commission

Requested From: Mike Brosch

Data Request No. AG/UTI-058

Re: Supplemental Testimony of Gary Weiss page 29; 4 CSR 240-10.020 and Schedule GSW-E-38 Please respond to the following regarding Mr. Weiss' "Rate Change Recommendation Under 4 CSR 240-10.020" as calculated in Schedule GSW-E38:

- a) State whether Mr. Weiss or the Company are aware of any Missouri utility that has been awarded rate relief based upon the type of calculations presented in Schedule GSW-E38.
- b) If your response to part (a) is affirmative, please identify each utility and the related Commission order that has been awarded such relief and provide copies of documents associated with your response.
- c) State whether Mr. Weiss believes that the Company will have a reasonable opportunity to earn a reasonable return on invested capital only if its revenue requirement is increased for the difference between the "Under Current Method" and the "Under 4 CSR 240-10.020) amounts shown at lines 23 and 24 of Schedule GSW-E38.
- d) Explain your response to part (c) and provide complete copies of all workpapers, studies, reports, projections, analyses and other documents associated with your response to part (c).
- e) State whether the Company is believed by Mr. Weiss to be an "Affected utility" as defined in paragraph (5) of 4 CSR 240-10.020 and, if so, provide copies of the filings made by the Company of "the income from the investment of moneys in depreciation funds" as required by paragraph (5).
- f) State whether Mr. Weiss or any other Company employees have conducted any analyses to determine the "Return on Depreciation Reserves" rate of 3%, as shown at line 14 of Schedule GSW-E38, is "reasonably and equitably applicable" to the Company's depreciation reserves, as referenced in paragraph (4) of 4 CSR 240-10.020.
- g) If your response to part (f) of this data request is affirmative, please explain and provide complete copies of all such analyses, workpapers, calculations and other information associated with or supportive of your response.

Response:

- a. No.
- b. N/A
- c. It depends on how other factors in the rate case are addressed.
- d. No such workpapers, studies, reports, projections, analyses or other documents exist.
- e. No such reports exist. Mr. Weiss believes that it is up to the Commission to determine whether AmerenUE is an affected utility.
- f. No such analyses have been conducted.
- g. N/A

Prepared By: Gary S. Weiss
Title: Manager Regulatory Accounting
Date: November 21, 2006

State Exhibit No. 523
Case No(s) ER-2007-0002
Date 3/27/07 Rptr MU