

FILED³

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Ameren'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-333

Ref: Rebuttal Testimony of AmerenUE witness Mr. Moehn, page 4 (Joppa Plant Risks) At page 4 of his Rebuttal, Mr. Moehn states, "AmerenUE had no assurance of any kind from the Missouri Public Service Commission that any detrimental financial effects of these events could be included in and recovered through rates." Please provide the following information:

- a. Is AmerenUE or Mr. Moehn aware of any request by the Company for any such "assurance"?
- b. Is AmerenUE or Mr. Moehn aware of any Missouri PSC Order or other document denying recovery of any "detrimental financial effects" that may have occurred at the Joppa Plant?
- c. Please provide complete copies of all testimony, pleadings, correspondence, MPSC Orders and other documents (if any) that were relied upon by Mr. Moehn to determine that shareholders were at risk for any events or detrimental financial effects that may arise at the Joppa Plant.

Response:

AmerenUE has always treated the investment in EEInc. as a below-the-line investment. It has never behaved inconsistently with that treatment. Accordingly, it has never asked, nor would it ask, the Missouri Public Service Commission for assurances that the Commission would act inconsistently with the below-the-line character of the investment EEInc. by recovering the costs of "detrimental financial effects" at EEInc. through rates.

Prepared By: Mark Vantrease

Title: Managing Supervisor, Strategic Planning

Date: February 16, 2007

State of MO Exhibit No. 516
Case No(s) ER-2007-0002
Date 3/20/07 Rptr MW