

Exhibit No.:  
Issue: Revenue Requirement  
Witness: James R. Dauphinais  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Missouri Industrial Energy Consumers  
Case No.: ER-2012-0166  
Date Testimony Prepared: July 6, 2012

FILED  
October 23, 2012  
Data Center  
Missouri Public  
Service Commission

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

In the Matter of Union Electric Company,  
d/b/a Ameren Missouri's Tariff to Increase  
Its Annual Revenues for Electric Service

Case No. ER-2012-0166  
Tariff No. YE-2012-0370

Direct Testimony and Schedules of

**James R. Dauphinais**

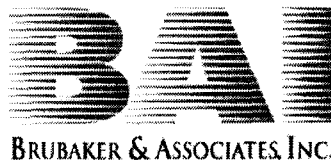
**Revenue Requirement**

On behalf of

**Missouri Industrial Energy Consumers**

**NON-PROPRIETARY VERSION**

July 6, 2012



MIEC Exhibit No. 517  
Date 10/3/12 Reporter SR  
File No. ER-2012-0166

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**STATE OF MISSOURI )  
 )  
COUNTY OF ST. LOUIS )**

**SS**

**Affidavit of James R. Dauphinais**

James R. Dauphinais, being first duly sworn, on his oath states:

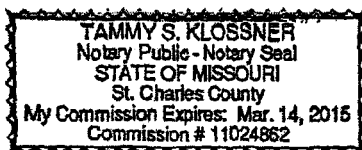
1. My name is James R. Dauphinais. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes are my direct testimony and schedules, which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2012-0166.

3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

  
James R. Dauphinais

Subscribed and sworn to before me this 5<sup>th</sup> day of July, 2012.



  
Notary Public

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**Direct Testimony of James R. Dauphinais**

**I. INTRODUCTION**

1

2   **Q     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3   **A     James R. Dauphinais. My business address is 16690 Swingley Ridge Road,**  
4       **Suite 140, Chesterfield, MO 63017.**

5   **Q     WHAT IS YOUR OCCUPATION?**

6   **A     I am a consultant in the field of public utility regulation and a Principal of Brubaker &**  
7       **Associates, Inc., energy, economic and regulatory consultants.**

8   **Q     PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

9   **A     This information is included in Appendix A to my direct testimony on revenue**  
10       **requirement issues.**

11   **Q     ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

12   **A     This testimony is presented on behalf of the Missouri Industrial Energy Consumers**  
13       **("MIEC"). Member companies purchase substantial amounts of electric service from**  
14       **Union Electric Company ("Ameren Missouri" or "Company").**

**James R. Dauphinais**  
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1    **Q     HAVE YOU PRESENTED TESTIMONY IN PRIOR PROCEEDINGS BEFORE THE**  
2    **MISSOURI PUBLIC SERVICE COMMISSION ("COMMISSION")?**

3    A     Yes. I have been involved in a number of proceedings before the Commission  
4           including, but not limited to, Case Nos. ER-2007-0002, ER-2008-0318,  
5           ER-2010-0036 and ER-2011-0028, where I testified in regard to Ameren Missouri's  
6           fuel cost, off-system sales and transmission revenues and expenses.

7    **Q     WHAT IS THE SUBJECT OF YOUR TESTIMONY?**

8    A     My testimony addresses the Net Base Fuel Cost that Ameren Missouri proposes to  
9           include in its revenue requirement. Specifically, I address the *Other Fuel and*  
10          *Purchased Power Costs* and *Other Sales Revenues* components of Ameren  
11          Missouri's Net Base Fuel Cost. My colleague, Mr. Phillips, addresses issues related  
12          to the *Net Fuel Cost* component of Ameren Missouri's Net Base Fuel Cost.

13                 I also briefly discuss Ameren Missouri's proposed ratemaking treatment in this  
14                 proceeding of wholesale electric sales to certain municipal electric utilities.

15                 The fact that I do not address a particular issue should not be interpreted as  
16                 approval of any position taken by Ameren Missouri.

17   **Q     IN PAST PROCEEDINGS, YOU HAVE TESTIFIED ON BEHALF OF MIEC IN**  
18   **REGARD TO AMEREN MISSOURI'S NET FUEL COST ISSUES. HAVE YOU**  
19   **REVIEWED MR. PHILLIPS' DIRECT TESTIMONY AND ANALYSIS IN THIS**  
20   **PROCEEDING WITH REGARD TO THOSE ISSUES?**

21   A     Yes. I have carefully reviewed Mr. Phillips' direct testimony and the analysis that  
22          underlies that direct testimony. I concur with the results of his analysis and his

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1 recommendations to the Commission with regard to the Net Fuel Cost component of  
2 Ameren Missouri's Net Base Fuel Cost.

3 **Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

4 A I recommend that the Commission reduce Ameren Missouri's proposed Net Base  
5 Fuel Cost from its original filing in this case (and, thus, its original filing revenue  
6 requirement) by at least \$13.0 million. This adjustment will correct: (i) the  
7 \$7.7 million overstatement of Net Fuel Cost identified in Mr. Phillips' direct testimony;  
8 (ii) the \$2.3 million overstatement of Other Fuel and Purchased Power Costs that I  
9 have identified herein; and (iii) the \$3.0 million understatement of Other Sales  
10 Revenues that I have identified herein.

11 **Q IS THERE ANYTHING ELSE YOU WOULD LIKE TO NOTE BEFORE**  
12 **PROCEEDING FURTHER INTO YOUR TESTIMONY?**

13 A Yes. Ameren Missouri has proposed in this proceeding to seek recovery of the cost  
14 of consumables such as urea, limestone and powder-activated carbon as part of its  
15 Net Base Fuel Cost and to track such costs through its Fuel Adjustment Clause  
16 ("FAC") (Direct Testimony of Lynn Barnes at 11-12). While MIEC is not opposing  
17 Ameren Missouri's recovery of these costs through its base rate revenue requirement,  
18 MIEC is not at this time agreeing that Ameren Missouri should be allowed to:  
19 (i) recover these costs as part of the Net Base Fuel Cost portion of its base rate  
20 revenue requirement and (ii) track these costs through its FAC. MIEC is still studying  
21 this issue and will reflect its position on this issue in its rate design testimony.

James R. Dauphinais  
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## **II. NET BASE FUEL COST**

**Q PLEASE EXPLAIN THE TERM NET BASE FUEL COST.**

**A** Ameren Missouri's Net Base Fuel Cost is the portion of Ameren Missouri's revenue requirement that is tracked through its Fuel Adjustment Clause. It consists of three major components:

1. **Net Fuel Cost** – Fuel and purchased power costs for native load and off-system sales, less off-system energy sales revenues, as estimated using production cost modeling.

Plus

2. **Other Fuel and Purchased Power Costs** – Fuel additive costs, net fly ash revenues and expenses, fixed gas supply costs, credits from Westinghouse related to a prior nuclear fuel settlement, MISO Day 2 expenses, PJM expenses, Account 565 transmission expenses, MISO ancillary service costs, net Load and Generation Forecasting Deviation costs, and the cost of purchased power to serve common boundary customers.

Less

3. **Other Sales Revenues** – Off-system capacity sales, MISO ancillary service revenues and MISO Day 2 revenues (including MISO RSG Make Whole Payment Margins).<sup>1</sup>

(Direct Testimony of Weiss at 35-36, Direct Testimony of Peters at 2-3 and Direct Testimony of Haro at 3-5).

**Q WHAT STANDARD SHOULD THE COMMISSION USE TO SET THE NET BASE FUEL COST COMPONENT OF AMEREN MISSOURI'S REVENUE REQUIREMENT?**

**A** It should be set on the same standard as the remainder of Ameren Missouri's revenue requirement. Specifically, it should be set based on Ameren Missouri's actual costs during the historic test year ending September 30, 2011 adjusted for

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<sup>1</sup>As will be discussed later in this testimony, this component of Net Base Fuel Cost should also include Ameren Missouri's net Bilateral Off-System Energy Sales Margins and net Swap Margins since they are not included in Ameren Missouri's estimate of Net Fuel Cost.

1 known and measurable changes from the true-up period that ends July 31, 2012 and  
2 normalized to annualize periodic expenses and address abnormalities such as annual  
3 swings in weather and commodity market prices.

4 **Q WHAT IS THE TOTAL ANNUAL NET BASE FUEL COST THAT AMEREN**  
5 **MISSOURI PROPOSED IN ITS ORIGINAL FILING IN THIS PROCEEDING?**

6 **A** Ameren Missouri proposed a Net Base Fuel Cost of approximately \$596 million. This  
7 consists of a Net Fuel Cost of \$555 million plus Other Fuel and Purchased Power  
8 Costs of \$60 million less Other Sales Revenues of approximately \$19 million  
9 (Schedule GSW-E17, Direct Testimony of Peters at 2-3 and Direct Testimony of Haro  
10 at 5). The amount is an approximately \$103 million increase from the Net Base Fuel  
11 Cost approved by the Commission for Ameren Missouri in Case No. ER-2011-0028.

12 **Q PLEASE DESCRIBE YOUR REVIEW OF AMEREN MISSOURI'S PROPOSED NET**  
13 **BASE FUEL COST AMOUNT.**

14 **A** I reviewed the direct testimony and schedules of Ameren Missouri witnesses Peters,  
15 Haro and Weiss in regard to Net Base Fuel Cost. I also reviewed Ameren Missouri's  
16 response to data requests in this proceeding that relate to the issue. In addition, I  
17 reviewed Mr. Phillips' analysis and direct testimony related to the Net Fuel Cost  
18 component of Ameren Missouri's Net Base Fuel Cost. Finally, I applied my  
19 experience to the information available in considering the reasonableness of Ameren  
20 Missouri's proposed Net Base Fuel Cost amount. As I have noted, I have identified  
21 issues with Ameren Missouri's proposed level of Other Fuel and Purchased Power  
22 Costs and Other Sales Revenues. In addition, Mr. Phillips has identified issues

1 related to certain assumptions Ameren Missouri used in its production cost modeling  
2 for Net Fuel Cost.

3 **A. Adjustments to Net Fuel Cost**

4 **Q PLEASE SUMMARIZE MIEC'S RECOMMENDED ADJUSTMENTS TO THE NET**  
5 **FUEL COST COMPONENT OF AMEREN MISSOURI'S NET BASE FUEL COST.**

6 A MIEC and I are incorporating my colleague, Mr. Phillips', recommendation that  
7 Ameren Missouri's Net Fuel Cost amount be reduced by \$7.7 million from Ameren  
8 Missouri's original filed Net Fuel Cost value. As Mr. Phillips discusses in detail in his  
9 direct testimony, the reduction includes an update to the commodity price  
10 assumptions used by Ameren Missouri and adjustments to the minimum generation  
11 capability assumptions Ameren Missouri used in its production cost modeling for Net  
12 Fuel Cost.

13 **Q SHOULD THIS VALUE BE UPDATED FURTHER AFTER THE END OF THE**  
14 **TRUE-UP PERIOD ONCE DATA THROUGH THE END OF THE TRUE-UP PERIOD**  
15 **BECOMES AVAILABLE?**

16 A Yes, the production cost modeling should be further updated at that time.

17 **B. Adjustments to Other Fuel and Purchased Power Costs**

18 **Q HAVE YOU UPDATED ANY OF AMEREN MISSOURI'S ORIGINAL FILED VALUES**  
19 **FOR THE OTHER FUEL AND PURCHASED POWER COSTS COMPONENT OF**  
20 **NET BASE FUEL COST?**

21 A Yes. In response to MPSC Staff Data Request 0362, Ameren Missouri provided  
22 updated data regarding the elements that make up the "MISO Day 2 Excluding Admin

(Acct 555)" and "Ancillary Services Purchased (Acct 555)" portion of Ameren Missouri's Other Fuel and Purchased Power Costs.

Through April 2012, the updated value for "MISO Day 2 Excluding Admin (Acct 555)" is an expense of approximately \*\*\_\_\_\_\_\*\*. This is approximately \$2.5 million lower than Ameren Missouri's original filed value for this expense.

Through April 2012, the updated value for "Ancillary Services Purchased (Acct 555)" is approximately \*\*\_\_\_\_\_\*\*. This is approximately \$0.2 million higher than Ameren Missouri's original filed value for this expense.

These two updates together net to a downward adjustment of approximately \$2.3 million to Ameren Missouri's original filed value for Other Fuel and Purchased Power Costs. Schedule JRD-1 summarizes the calculations for this adjustment.

**Q SHOULD AMEREN MISSOURI'S OTHER FUEL AND PURCHASED POWER COSTS VALUE BE FURTHER UPDATED ONCE ALL THE NECESSARY HISTORICAL DATA THROUGH THE END OF THE TRUE-UP PERIOD IS KNOWN?**

**A** Yes. All of the values that make up Ameren Missouri's Other Fuel and Purchased Power Costs should be updated through the end of July 31, 2012 once the necessary historical data becomes available.

**Q ARE YOU PROPOSING ANY OTHER ADJUSTMENTS AT THIS TIME TO AMEREN MISSOURI'S ORIGINAL FILED VALUES FOR THE OTHER FUEL AND PURCHASED POWER COSTS COMPONENT OF NET BASE FUEL COSTS?**

**A** No. While I continue my review of Ameren Missouri's filing and will review the direct testimony of other parties in this proceeding with regard to this issue, I am not

1 currently proposing any other adjustments to Ameren Missouri's proposed Other Fuel  
2 and Purchased Power Costs.

3 **C. Adjustments to Other Sales Revenues**

4 **Q HAVE YOU UPDATED ANY OF AMEREN MISSOURI'S ORIGINAL FILED VALUES**  
5 **FOR THE OTHER SALES REVENUES COMPONENT OF NET BASE FUEL COST?**

6 **A** Yes. In response to MPSC Staff Data Request 0362, Ameren Missouri provided  
7 updated data regarding the elements that make up the "MISO Day 2 Revenues –  
8 Inavert Dist (Acct 447)" and "Ancillary Services Revenue (Acct. 447)" portion of  
9 Ameren Missouri's Other Sales Revenues.

10 Through April 2012, the updated value for "MISO Day 2 Revenues – Inavert  
11 Dist (Acct 447)" is a revenue of approximately \*\*\_\_\_\_\_\*\*. This is approximately  
12 \$0.2 million higher than Ameren Missouri's original filed value for this revenue.

13 Through April 2012, the updated value for "Ancillary Services Revenue  
14 (Acct. 447)" is a revenue of approximately \*\*\_\_\_\_\_\*\*. This is approximately  
15 \$1.1 million lower than Ameren Missouri's original filed value for this revenue.

16 These two updates together net to a downward adjustment of approximately  
17 \$0.9 million to Ameren Missouri's original filed value for Other Sales Revenues.  
18 Schedule JRD-1 also summarizes the calculations for this adjustment.



1 Q SHOULD AMEREN MISSOURI'S OTHER SALES REVENUES VALUE BE  
2 FURTHER UPDATED ONCE ALL THE NECESSARY HISTORICAL DATA  
3 THROUGH THE END OF THE TRUE-UP PERIOD IS KNOWN?

4 A Yes. All of the values that make up Ameren Missouri's Other Sales Revenues should  
5 be updated through the end of July 31, 2012 once the necessary historical data  
6 becomes available.

7 Q ARE YOU PROPOSING ANY OTHER ADJUSTMENTS AT THIS TIME TO AMEREN  
8 MISSOURI'S FILED VALUES FOR THE OTHER SALES REVENUES  
9 COMPONENT OF NET BASE FUEL COST?

10 A Yes. I have adjustments related to Bilateral Off-System Energy Sales Margins and  
11 Swap Margins. In addition, I offer testimony on RSG Make Whole Payment Margins.

12 C.1. Bilateral Off-System Energy Sales Margins

13 Q PLEASE EXPLAIN THE TERM "BILATERAL OFF-SYSTEM ENERGY SALES  
14 MARGINS."

15 A "Bilateral Off-System Energy Sales Margins" is a term I first introduced in  
16 Case No. ER-2011-0028. It refers to the off-system energy sales margins  
17 Ameren Missouri has been successful at earning from bilateral sales that are in  
18 excess of those margins that Ameren Missouri would have earned by just selling the  
19 energy into the MISO day-ahead and real-time energy market. These additional  
20 margins are not reflected in the normalized test year production cost runs because  
21 those runs assume Ameren Missouri makes all of its off-system energy sales into the  
22 MISO day-ahead energy market. These additional margins must be estimated

1 outside of the production cost modeling and incorporated into the Other Sales  
2 Revenues component of Ameren Missouri's Net Base Fuel Cost.

3 **Q HAS AMEREN MISSOURI INCLUDED ANY "BILATERAL OFF-SYSTEM ENERGY**  
4 **SALES MARGINS" IN ITS PROPOSED NET BASE FUEL COST?**

5 A No. In effect, Ameren Missouri is assuming any bilateral energy sales it makes will  
6 likely be at sales prices that average to the same prices at which it makes off-system  
7 energy sales in its normalized test year production cost run. However, this is not a  
8 reasonable assumption.

9 **Q PLEASE EXPLAIN WHY THIS IS AN UNREASONABLE ASSUMPTION.**

10 A There are two reasons. First, if over the long haul the margins from bilateral energy  
11 sales were equal to or less than those made by simply selling into the MISO  
12 day-ahead and real-time energy markets, Ameren Missouri likely would have long  
13 ago ceased making bilateral sales of electric energy. Second, we reviewed Ameren  
14 Missouri's monthly 4 CSR 240-3.190(1) E data ("3.190 Data") submittals, which were  
15 provided to MIEC for May 2009 through April 2012 through a combination of data  
16 request responses and non-unanimous stipulations in Case Nos. ER-2010-0036 and  
17 ER-2011-0028. From that review, we determined that Ameren Missouri over that  
18 36-month period did in fact earn off-system energy sales margins from bilateral sales  
19 to third parties that were greater than what Ameren Missouri would have earned by  
20 simply selling that energy into the MISO day-ahead and real-time energy markets.

1    **Q     PLEASE EXPLAIN HOW YOU WERE ABLE TO DETERMINE FROM THE**  
2       **3.190 DATA THAT AMEREN MISSOURI HAS BEEN EARNING MARGINS FROM**  
3       **OFF-SYSTEM BILATERAL ENERGY SALES IN EXCESS OF THE MARGINS**  
4       **FROM ENERGY SALES INTO THE MISO DAY-AHEAD AND REAL-TIME ENERGY**  
5       **MARKETS.**

6    **A     The best place to start this explanation is to discuss how Ameren Missouri clears its**  
7       generation, load and bilateral sales in the MISO day-ahead energy market.

8    **Q     WHY ARE YOU FOCUSING ON THE DAY-AHEAD MARKET?**

9    **A     The normalized test year production cost runs only simulate the day-ahead market.**  
10    Ameren Missouri separately accounts for its interactions with MISO in the MISO  
11    real-time energy market through its proposed net Load and Generation Forecasting  
12    Deviation cost adder that Ameren Missouri includes in the Other Fuel and Purchased  
13    Power Costs component of its Net Base Fuel Cost.

14   **Q     HOW DOES AMEREN MISSOURI CLEAR ITS GENERATION, LOAD AND**  
15       **BILATERAL SALES IN THE MISO DAY-AHEAD ENERGY MARKET?**

16   **A     Ameren Missouri offers all of its generation into the MISO day-ahead market and bids**  
17       its forecasted load into the MISO day-ahead market. When Ameren Missouri's  
18       cleared generation MWh in a given hour exceed its cleared load MWh in that hour,  
19       Ameren Missouri has a net off-system energy sale equal to the difference between  
20       the cleared generation and load MWh. If Ameren Missouri has no bilateral energy  
21       sales transactions in that hour, the total off-system energy sales revenue earned by  
22       Ameren Missouri for that hour will be equal to the off-system energy sales MWh  
23       multiplied by the day-ahead Locational Marginal Price ("LMP") associated with the

1 generators that produced those off-system energy sales MWh. These are the same  
2 off-system energy revenues that are being estimated in the normalized test year  
3 production cost runs that are performed to determine Ameren Missouri's Net Fuel  
4 Cost.

5 **Q WHAT HAPPENS IN AN HOUR IN WHICH AMEREN MISSOURI DOES HAVE A**  
6 **BILATERAL ENERGY SALES TRANSACTION IN THE MISO DAY-AHEAD**  
7 **MARKET?**

8 **A** There is an opportunity to earn additional off-system energy sales revenues from that  
9 bilateral transaction. The bilateral energy sales transaction is scheduled and cleared  
10 in the MISO day-ahead energy market. The cleared bilateral energy sales  
11 transaction requires Ameren Missouri to incur a charge equal to the MWh of the  
12 transaction multiplied by the day-ahead LMP associated with the delivery point of the  
13 bilateral transaction. This charge will be offset by the revenue associated with the  
14 bilateral transaction that Ameren Missouri is receiving from the buyer of energy under  
15 the transaction. When the bilateral contract price paid by the buyer to Ameren  
16 Missouri equals the LMP at the delivery point, Ameren Missouri receives no  
17 off-system energy sales margins in excess of what it is paid by MISO (i.e., Bilateral  
18 Off-System Energy Sales Margins are zero). Effectively, this is what  
19 Ameren Missouri has assumed in its filing -- it will receive no additional margins by  
20 selling energy bilaterally rather than into the MISO day-ahead and real-time energy  
21 markets.

1    **Q     WHAT IF THE BILATERAL SALES PRICE IS GREATER THAN THE LMP AT THE**  
2    **DELIVERY POINT?**

3    A     Ameren Missouri will earn a Bilateral Off-System Energy Sales Margin equal to the  
4    MWh of the transaction in that hour times the difference between the contract price  
5    paid by the buyer and the LMP paid by Ameren Missouri to MISO for the transaction.

6    **Q     WHAT IF THE BILATERAL SALES PRICE IS LESS THAN THE LMP AT THE**  
7    **DELIVERY POINT?**

8    A     Ameren Missouri will incur a negative Bilateral Off-System Energy Sales Margin equal  
9    to the MWh of the transaction in that hour times the difference between the LMP paid  
10   by Ameren Missouri to MISO for the transaction and the contract price paid by the  
11   buyer to Ameren Missouri.

12   **Q     HAVE YOU BEEN ABLE TO ESTIMATE A NORMALIZED LEVEL OF NET**  
13   **BILATERAL OFF-SYSTEM ENERGY SALES MARGINS?**

14   A     Yes. Using Ameren Missouri's 3.190 Data for May 2009 through April 2012, for all of  
15   Ameren Missouri's bilateral energy sales transactions, we calculated the difference  
16   each hour between contract revenue earned by Ameren Missouri and the LMP at the  
17   delivery point paid by Ameren Missouri to MISO or PJM. We algebraically summed  
18   these hourly values to get Ameren Missouri's net Bilateral Off-System Energy Sales  
19   Margins for this 36-month period. We then annualized this sum to a normalized value  
20   by dividing it by three. These calculations, which are summarized in Schedule JRD-2,  
21   yielded a normalized net Bilateral Off-System Energy Sales Margin of approximately  
22   \$3.1 million per year.

1    **Q     WHAT DO YOU RECOMMEND TO THE COMMISSION IN REGARD TO THIS**  
2    **ISSUE?**

3    A     I recommend the Commission include approximately \$3.1 million of net Bilateral  
4    Off-System Energy Sales Margins in the Other Sales Revenues component of  
5    Ameren Missouri's proposed Net Base Fuel Cost. This will reduce Ameren Missouri's  
6    Net Base Fuel Cost and revenue requirement by \$3.1 million.

7    **Q     YOUR CALCULATION IS BASED ON EXAMINING THE 36 MONTHS ENDING**  
8    **APRIL 30, 2012. WOULD IT BE REASONABLE TO UPDATE THIS**  
9    **CALCULATION FOR THE 36 MONTHS ENDING JULY 31, 2012 (THE END OF**  
10   **THE TRUE-UP PERIOD) WHEN THE NECESSARY 3.190 DATA BECOMES**  
11   **AVAILABLE?**

12   A     Yes, it would be reasonable to update the value at the end of the true-up period in  
13   this proceeding.

14    C.2. Swap Margins

15   **Q     PLEASE EXPLAIN THE TERM "SWAP MARGINS."**

16   A     "Swap Margins" are the net proceeds from financial bilateral contracts that Ameren  
17   Missouri enters into to hedge wholesale market prices for electric energy. A swap is  
18   a financial contract where one party exchanges a fixed price at a defined hub for a  
19   floating index price at that same hub. An example would be a hypothetical 50 MW  
20   on-peak day-ahead swap at Indiana Hub where a counterparty agrees to pay Ameren  
21   Missouri a fixed \$ per MWh price for 50 MW of volume in exchange for  
22   Ameren Missouri paying the counterparty an hourly revenue stream equal to the  
23   MISO day-ahead LMP for Indiana Hub for 50 MW of volume.

1    **Q     HAS AMEREN MISSOURI INCLUDED ANY "SWAP MARGINS" IN ITS PROPOSED**  
2    **NET BASE FUEL COST?**

3    A     No. In effect, Ameren Missouri is assuming any financial bilateral contracts it enters  
4           into will likely be at fixed prices that average to the same price as the average LMP.  
5           However, this is not a reasonable assumption.

6    **Q     PLEASE EXPLAIN WHY THIS IS AN UNREASONABLE ASSUMPTION.**

7    A     There are two reasons. First, if over the long haul there was no net benefit from  
8           swaps, Ameren Missouri likely would have long ago ceased entering into swaps.  
9           Second, we reviewed Ameren Missouri's monthly 4 CSR 240-3.190(1) E data  
10          ("3.190 Data") submittals, which report on the swap margins and were provided to  
11          MIEC for May 2009 through April 2012 through a combination of data request  
12          responses and non-unanimous stipulations in Case Nos. ER-2010-0036 and  
13          ER-2011-0028. From that review, we were able to determine that Ameren Missouri  
14          over the 24-month month period of May 2010 through April 2012 did in fact earn a  
15          significant amount of net margins from swaps.<sup>2</sup>

16   **Q     WHAT DO YOU RECOMMEND TO THE COMMISSION REGARDING THIS ISSUE?**

17   A     I recommend that the Commission include approximately \$0.8 million of net Swap  
18          Margins in the Other Sales Revenues component of Ameren Missouri's proposed Net  
19          Base Fuel Cost. As shown in Schedule JRD-3, this is the normalized annual level of  
20          these margins for the 24 months ending April 30, 2012. This will reduce  
21          Ameren Missouri's Net Base Fuel Cost and revenue requirement by \$0.8 million.

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<sup>2</sup>At the time this testimony is being prepared, I do not have access to swap margins information prior to May of 2010. Otherwise, I would have evaluated 36 months of swap margins data rather than 24 months of data.

1 Q YOUR CALCULATION IS BASED ON EXAMINING THE 24 MONTHS ENDING  
2 APRIL 30, 2012. WOULD IT BE REASONABLE TO UPDATE THIS  
3 CALCULATION FOR THE 36 MONTHS ENDING JULY 31, 2012 (THE END OF  
4 THE TRUE-UP PERIOD) WHEN THE NECESSARY 3.190 DATA BECOMES  
5 AVAILABLE?

6 A Yes, it would be reasonable to update the value at the end of the true-up period in  
7 this proceeding to the extent the appropriate data becomes available.

8 *C.3. MISO Revenue Sufficiency*  
9 *Guarantee ("RSG") Make Whole Payment Margins*

10 Q PLEASE DEFINE AND EXPLAIN THE RELEVANCE OF MISO RSG MAKE WHOLE  
11 PAYMENT MARGINS.

12 A MISO RSG Make Whole Payment Margins are the make whole payment revenues  
13 that Ameren Missouri receives under the Midwest Independent Transmission System  
14 Operator, Inc.'s ("MISO") RSG provisions less the additional fuel cost Ameren  
15 Missouri incurs due to MISO's commitment of Ameren Missouri's generation facilities  
16 that is not captured in the normalized test year production cost simulation Ameren  
17 Missouri performs to estimate its Net Fuel Cost.

18 Under MISO's RSG provisions, MISO guarantees that any generator it  
19 commits online will earn revenue at least equal to the sum of the startup, no load and  
20 energy offer prices of that generator. When the LMP paid by MISO to a generator for  
21 energy produced pursuant to MISO's dispatch orders is insufficient to cover the sum  
22 of startup, no load and energy offer prices for that generator, the MISO will pay a  
23 make whole payment to the generator to cover those offer prices. This typically  
24 happens when MISO orders a generator (e.g., a combustion turbine generator) online  
25 out-of-merit order for reliability purposes.

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1           Neither the RSG Make Whole Payments Ameren Missouri receives nor the  
2 out-of-merit order energy production required of Ameren Missouri's generation  
3 facilities by MISO is reflected in the normalized test year production cost model run  
4 that Ameren Missouri uses to estimate its Net Fuel Cost. As a result, the difference  
5 between the RSG Make Whole Payments Ameren Missouri receives from MISO and  
6 the out-of-merit order fuel cost Ameren Missouri incurs due to MISO must be included  
7 separately in the Other Sales Revenues component of Ameren Missouri's Net Base  
8 Fuel Cost.

9   **Q   HAS AMEREN MISSOURI IDENTIFIED THE AMOUNT OF MISO RSG MAKE**  
10 **WHOLE PAYMENTS IT RECEIVED DURING THE TEST PERIOD IN THIS**  
11 **PROCEEDING?**

12   A   Yes. Mr. Weiss' workpapers identify approximately \$12.1 million of MISO RSG Make  
13 Whole Payments during the test year for this proceeding. He refers to these  
14 payments in this workpaper as RSG and Deviation Revenues.

15   **Q   WHAT PORTION OF THIS \$12.1 MILLION AMOUNT HAS AMEREN MISSOURI**  
16 **INCLUDED IN ITS PROPOSED OTHER SALES MARGINS TOTAL AS MISO RSG**  
17 **MAKE WHOLE PAYMENT MARGINS?**

18   A   \$1.6 million, or 13% of the \$12.1 million amount.

19   **Q   HAS AMEREN MISSOURI PROVIDED TESTIMONY SUPPORTING THIS 13% RSG**  
20 **MAKE WHOLE PAYMENTS MARGIN PERCENTAGE ASSUMPTION?**

21   A   No. However, in response to MPSC Staff Data Request 0363, Ameren Missouri  
22 indicated that the 13% value is a placeholder (based on the historic 12 months that

1 ended in January 2011) for the 12 months that ended September 2011. In that same  
2 response, Ameren Missouri provided its workpapers for the 13% value and indicated  
3 the 13% value will be updated as part of the true-up in this proceeding.

4 **Q WHAT DO YOU RECOMMEND TO THE COMMISSION REGARDING THE MISO**  
5 **RSG MAKE WHOLE PAYMENT MARGINS ISSUE?**

6 A While I do not object to using Ameren Missouri's \$1.6 million RSG Make Whole  
7 Payment Margins amount as a placeholder for now, the margin percentage, the RSG  
8 Make Whole Payment Revenue amount and the resulting RSG Make Whole Payment  
9 Margin amount need to be updated for the 36 months ending July 31, 2012 as part of  
10 the Company's true-up in this case.

11 *C.4. Summary of Recommended Adjustments*  
12 *to Ameren Missouri's Proposed Level of Other Sales Revenues*

13 **Q CAN YOU PLEASE SUMMARIZE ALL OF YOUR PROPOSED ADJUSTMENTS AT**  
14 **THIS TIME TO AMEREN MISSOURI'S PROPOSED LEVEL OF OTHER SALES**  
15 **REVENUES?**

16 A Yes. My total adjustment at this time is a net \$3.0 million increase to Ameren  
17 Missouri's proposed level of Other Sales Revenues, which would result in a reduction  
18 of the same amount to Ameren Missouri's Net Base Fuel Cost and Revenue  
19 Requirement. The \$3.0 million net increase in Other Sales Revenues consists of a  
20 \$0.9 million decrease in revenues due to updated MISO market settlement revenue  
21 values, a \$3.1 million increase in revenues due to Bilateral Off-System Sales Margins  
22 and a \$0.8 million increase in revenues due to Swap Margins.

1                                   **III. RATEMAKING TREATMENT OF**  
2                                   **WHOLESALE SALES TO CERTAIN MUNICIPALS**

3     **Q     IS AMEREN MISSOURI PROPOSING A DIFFERENT RATEMAKING TREATMENT**  
4           **OF WHOLESALE SALES OF ELECTRIC POWER TO CERTAIN MUNICIPAL**  
5           **ELECTRIC UTILITIES THAN IT HAS IN ITS BASE RATE CASES PRIOR TO CASE**  
6           **NO. ER-2011-0028?**

7     **A     Yes. Prior to Case No. ER-2011-0028, Ameren Missouri calculated its total revenue**  
8           **requirement to serve the combination of its sales to its retail customers and its**  
9           **multi-year wholesale sales of electricity to certain municipal electric utilities.**  
10          **Ameren Missouri utilized a jurisdictional allocator to allocate that revenue requirement**  
11          **between its Missouri retail customers and the municipal electric utility customers. In**  
12          **this proceeding (and previously in Case No. ER-2011-0028), Ameren Missouri has**  
13          **not included those wholesale sales to certain municipal electric systems in**  
14          **determining its revenue requirement and instead assumed that those wholesale sales**  
15          **are implicitly part of its estimated normalized test year off-system capacity and energy**  
16          **sales. The result is a revenue requirement that is entirely allocated to**  
17          **Ameren Missouri's retail customers.**

18    **Q     IS MIEC TAKING ISSUE WITH THIS PROPOSED RATEMAKING TREATMENT IN**  
19          **THIS PROCEEDING?**

20    **A     Like in Case No. ER-2011-0028, MIEC is not taking issue with this proposed**  
21          **ratemaking treatment in this proceeding. However, MIEC reserves the right to**  
22          **challenge such ratemaking treatment of wholesale sales in future rate proceedings.**

1                   **IV. CONCLUSIONS AND RECOMMENDATIONS**

2    **Q       PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

3    **A       I recommend that the Commission reduce Ameren Missouri's proposed Net Base**  
4           **Fuel Cost from its original filing in this case (and, thus, its original filing revenue**  
5           **requirement) by at least \$13.0 million. This adjustment will correct: (i) the**  
6           **\$7.7 million overstatement of Net Fuel Cost identified in Mr. Phillips' direct testimony;**  
7           **(ii) the \$2.3 million overstatement of Other Fuel and Purchased Power Costs that I**  
8           **have identified herein; and (iii) the \$3.0 million understatement of Other Sales**  
9           **Revenues that I have identified herein.**

10   **Q       DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

11   **A       Yes, it does.**

### **Qualifications of James R. Dauphinais**

1    **Q     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A     James R. Dauphinais. My business address is 16690 Swingley Ridge Road,  
3     Suite 140, Chesterfield, MO 63017, USA.

4    **Q     PLEASE STATE YOUR OCCUPATION.**

5    A     I am a consultant in the field of public utility regulation and a Principal with the firm of  
6     Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

7    **Q     PLEASE    SUMMARIZE    YOUR    EDUCATIONAL    BACKGROUND    AND**  
8     **EXPERIENCE.**

9    A     I graduated from Hartford State Technical College in 1983 with an Associate's Degree  
10    in Electrical Engineering Technology. Subsequent to graduation I was employed by  
11    the Transmission Planning Department of the Northeast Utilities Service Company as  
12    an Engineering Technician.

13            While employed as an Engineering Technician, I completed undergraduate  
14    studies at the University of Hartford. I graduated in 1990 with a Bachelor's Degree in  
15    Electrical Engineering. Subsequent to graduation, I was promoted to the position of  
16    Associate Engineer. Between 1993 and 1994, I completed graduate level courses in  
17    the study of power system transients and power system protection through the  
18    Engineering Outreach Program of the University of Idaho. By 1996 I had been  
19    promoted to the position of Senior Engineer.

20            In the employment of the Northeast Utilities Service Company, I was  
21    responsible for conducting thermal, voltage and stability analyses of the Northeast

**James R. Dauphinais**  
**Appendix A**  
**Page 1**

1 Utilities' transmission system to support planning and operating decisions. This  
2 involved the use of load flow and power system stability computer simulations.  
3 Among the most notable achievements I had in this area include the solution of a  
4 transient stability problem near Millstone Nuclear Power Station, and the solution of a  
5 small signal (or dynamic) stability problem near Seabrook Nuclear Power Station. In  
6 1993 I was awarded the Chairman's Award, Northeast Utilities' highest employee  
7 award, for my work involving stability analysis in the vicinity of Millstone Nuclear  
8 Power Station.

9 From 1990 to 1997 I represented Northeast Utilities on the New England  
10 Power Pool Stability Task Force. I also represented Northeast Utilities on several  
11 other technical working groups within the New England Power Pool ("NEPOOL") and  
12 the Northeast Power Coordinating Council ("NPCC"), including the 1992-1996 New  
13 York-New England Transmission Working Group, the Southeastern  
14 Massachusetts/Rhode Island Transmission Working Group, the NPCC CPSS-2  
15 Working Group on Extreme Disturbances and the NPCC SS-38 Working Group on  
16 Interarea Dynamic Analysis. This latter working group also included participation  
17 from a number of ECAR, PJM and VACAR utilities.

18 In addition to my technical responsibilities, I was also responsible for oversight  
19 of the day-to-day administration of Northeast Utilities' Open Access Transmission  
20 Tariff. This included the creation of Northeast Utilities' pre-FERC Order No. 889  
21 transmission electronic bulletin board and the coordination of Northeast Utilities'  
22 transmission tariff filings prior to and after the issuance of Federal Energy Regulatory  
23 Commission ("FERC" or "Commission") FERC Order No. 888. I was also responsible  
24 for spearheading the implementation of Northeast Utilities' Open Access Same-Time  
25 Information System and Northeast Utilities' Standard of Conduct under FERC Order

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Appendix A  
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1 No. 889. During this time I represented Northeast Utilities on the Federal Energy  
2 Regulatory Commission's "What" Working Group on Real-Time Information Networks.  
3 Later I served as Vice Chairman of the NEPOOL OASIS Working Group and  
4 Co-Chair of the Joint Transmission Services Information Network Functional Process  
5 Committee. I also served for a brief time on the Electric Power Research Institute  
6 facilitated "How" Working Group on OASIS and the North American Electric Reliability  
7 Council facilitated Commercial Practices Working Group.

8 In 1997 I joined the firm of Brubaker & Associates, Inc. The firm includes  
9 consultants with backgrounds in accounting, engineering, economics, mathematics,  
10 computer science and business. Since my employment with the firm, I have filed or  
11 presented testimony before the Federal Energy Regulatory Commission in  
12 Consumers Energy Company, Docket No. OA96-77-000, Midwest Independent  
13 Transmission System Operator, Inc., Docket No. ER98-1438-000, Montana Power  
14 Company, Docket No. ER98-2382-000, Inquiry Concerning the Commission's Policy  
15 on Independent System Operators, Docket No. PL98-5-003, SkyGen Energy LLC v.  
16 Southern Company Services, Inc., Docket No. EL00-77-000, Alliance Companies, et  
17 al., Docket No. EL02-65-000, et al., Entergy Services, Inc., Docket No.  
18 ER01-2201-000, and Remedying Undue Discrimination through Open Access  
19 Transmission Service, Standard Electricity Market Design, Docket No. RM01-12-000,  
20 Midwest Independent Transmission System Operator, Inc., Docket No. ER10-1791-  
21 000 and NorthWestern Corporation, Docket No. ER10-1138-000. I have also filed or  
22 presented testimony before the Alberta Utilities Commission, Colorado Public Utilities  
23 Commission, Connecticut Department of Public Utility Control, Illinois Commerce  
24 Commission, the Indiana Utility Regulatory Commission, the Iowa Utilities Board, the  
25 Kentucky Public Service Commission, the Louisiana Public Service Commission, the

James R. Dauphinais  
Appendix A  
Page 3

1 Michigan Public Service Commission, the Missouri Public Service Commission, the  
2 Montana Public Service Commission, the City of New Orleans, the Public Utility  
3 Commission of Texas, the Wisconsin Public Service Commission and various  
4 committees of the Missouri State Legislature. This testimony has been given  
5 regarding a wide variety of issues including, but not limited to, avoided cost  
6 calculations, certification of public convenience and necessity, fuel adjustment  
7 clauses, interruptible rates, market power, market structure, prudence, resource  
8 planning, standby rates, transmission losses, transmission planning and transmission  
9 line routing.

10 I have also participated on behalf of clients in the Southwest Power Pool  
11 Congestion Management System Working Group, the Alliance Market Development  
12 Advisory Group and several working groups of the Midwest Independent  
13 Transmission System Operator, Inc. ("MISO"), including the Congestion Management  
14 Working Group and Supply Adequacy Working Group. I am currently an alternate  
15 member of the MISO Advisory Committee in the end-use customer sector on behalf  
16 of a group of industrial end-use customers in Illinois. I am also the past Chairman of  
17 the Issues/Solutions Subgroup of the MISO Revenue Sufficiency Guarantee ("RSG")  
18 Task Force.

19 In 2009, I completed the University of Wisconsin-Madison High Voltage Direct  
20 Current ("HVDC") Transmission course for Planners that was sponsored by MISO. I  
21 am a member of the Power and Energy Society ("PES") of the Institute of Electrical  
22 and Electronics Engineers ("IEEE").

23 In addition to our main office in St. Louis, the firm also has branch offices in  
24 Phoenix, Arizona and Corpus Christi, Texas.

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**James R. Dauphinais**  
**Appendix A**  
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# Non-Proprietary

## Ameren Missouri

### Case No. ER-2012-0166

#### MIEC Adjustments to MISO Market Settlement Expenses and Revenues

<u>Line No.</u>	<u>Category</u>	<u>AUE Filed<sup>1</sup></u>	<u>BAI<sup>2</sup></u>	<u>Adjustment</u>
<b>MISO Day 2 Expenses</b>				
1	Losses	****	****	****
2	RNU	****	****	****
3	RSG/Deviation	****	****	****
4	Congestion/FTR/ARR	****	****	****
5	Inadvertent	****	****	****
6	Total	****	****	(\$2,487,050.02)
<b>Ancillary Services Expenses</b>				
7	ASMP	****	****	****
8	RFRA	****	****	****
9	RFRS	****	****	****
10	SPRS	****	****	****
11	SURS	****	****	****
12	Total	****	****	\$168,474.56
13	Expenses Grand Total	****	****	<del>(\$2,318,575.46)</del>
<b>MISO Day 2 Revenues</b>				
14	Inadvertent	****	****	****
15	Total	****	****	\$141,015.57
<b>Ancillary Services Revenues</b>				
16	RFRS	****	****	****
17	SPRS	****	****	****
18	SURS	****	****	****
19	Total	****	****	(\$1,049,660.95)
20	Revenues Grand Total	****	****	<del>(\$908,645.38)</del>

Sources:

1 - Ameren\_1\_DIR\_012-Att-UEC MO elec rate case 09-2011 Workpapers.xlsx

2 - MPSC\_1-MPSC\_0362\_\_\_Lisa\_Hanneken-Att-MPSC 0362 GSW-WP-E425 Update through 5-12 HC.xls

# Non-Proprietary

Ameren Missouri  
Case No. ER-2012-0166

## MIEC Adjustments to Bilateral Off-System Energy Sales

Line No.	Month	Bilateral Off-System Energy Sales Margins	Source
1	May-09	****	Ameren response to MIEC 27.2 ER-2011-0028
2	Jun-09	****	Ameren response to MIEC 27.2 ER-2011-0028
3	Jul-09	****	Ameren response to MIEC 27.2 ER-2011-0028
4	Aug-09	****	Ameren response to MIEC 27.2 ER-2011-0028
5	Sep-09	****	Ameren response to MIEC 27.2 ER-2011-0028
6	Oct-09	****	Ameren response to MIEC 27.2 ER-2011-0028
7	Nov-09	****	Ameren response to MIEC 27.2 ER-2011-0028
8	Dec-09	****	Ameren response to MIEC 27.2 ER-2011-0028
9	Jan-10	****	Ameren response to MIEC 27.2 ER-2011-0028
10	Feb-10	****	Ameren response to MIEC 27.2 ER-2011-0028
11	Mar-10	****	Ameren response to MIEC 27.2 ER-2011-0028
12	Apr-10	****	Ameren response to MIEC 27.2 ER-2011-0028
13	May-10	****	MPSC 3.190 Data May 2010 - April 2012
14	Jun-10	****	MPSC 3.190 Data May 2010 - April 2012
15	Jul-10	****	MPSC 3.190 Data May 2010 - April 2012
16	Aug-10	****	MPSC 3.190 Data May 2010 - April 2012
17	Sep-10	****	MPSC 3.190 Data May 2010 - April 2012
18	Oct-10	****	MPSC 3.190 Data May 2010 - April 2012
19	Nov-10	****	MPSC 3.190 Data May 2010 - April 2012
20	Dec-10	****	MPSC 3.190 Data May 2010 - April 2012
21	Jan-11	****	MPSC 3.190 Data May 2010 - April 2012
22	Feb-11	****	MPSC 3.190 Data May 2010 - April 2012
23	Mar-11	****	MPSC 3.190 Data May 2010 - April 2012
24	Apr-11	****	MPSC 3.190 Data May 2010 - April 2012
25	May-11	****	MPSC 3.190 Data May 2010 - April 2012
26	Jun-11	****	MPSC 3.190 Data May 2010 - April 2012
27	Jul-11	****	MPSC 3.190 Data May 2010 - April 2012
28	Aug-11	****	MPSC 3.190 Data May 2010 - April 2012
29	Sep-11	****	MPSC 3.190 Data May 2010 - April 2012
30	Oct-11	****	MPSC 3.190 Data May 2010 - April 2012
31	Nov-11	****	MPSC 3.190 Data May 2010 - April 2012
32	Dec-11	****	MPSC 3.190 Data May 2010 - April 2012
33	Jan-12	****	MPSC 3.190 Data May 2010 - April 2012
34	Feb-12	****	MPSC 3.190 Data May 2010 - April 2012
35	Mar-12	****	MPSC 3.190 Data May 2010 - April 2012
36	Apr-12	****	MPSC 3.190 Data May 2010 - April 2012
37	3 Year Total	\$9,269,808	Sum of Lines 1-36
38	Normalized Annual	<b>\$3,089,936</b>	Line 37 ÷ 3

# Non-Proprietary

Ameren Missouri  
Case No. ER-2012-0166

## MIEC Adjustments to Swap Margins

Line No.	Month	Swap Margins	Source
1	May-10	****	MPSC 3.190 Data May 2010 - April 2012
2	Jun-10	****	MPSC 3.190 Data May 2010 - April 2012
3	Jul-10	****	MPSC 3.190 Data May 2010 - April 2012
4	Aug-10	****	MPSC 3.190 Data May 2010 - April 2012
5	Sep-10	****	MPSC 3.190 Data May 2010 - April 2012
6	Oct-10	****	MPSC 3.190 Data May 2010 - April 2012
7	Nov-10	****	MPSC 3.190 Data May 2010 - April 2012
8	Dec-10	****	MPSC 3.190 Data May 2010 - April 2012
9	Jan-11	****	MPSC 3.190 Data May 2010 - April 2012
10	Feb-11	****	MPSC 3.190 Data May 2010 - April 2012
11	Mar-11	****	MPSC 3.190 Data May 2010 - April 2012
12	Apr-11	****	MPSC 3.190 Data May 2010 - April 2012
13	May-11	****	MPSC 3.190 Data May 2010 - April 2012
14	Jun-11	****	MPSC 3.190 Data May 2010 - April 2012
15	Jul-11	****	MPSC 3.190 Data May 2010 - April 2012
16	Aug-11	****	MPSC 3.190 Data May 2010 - April 2012
17	Sep-11	****	MPSC 3.190 Data May 2010 - April 2012
18	Oct-11	****	MPSC 3.190 Data May 2010 - April 2012
19	Nov-11	****	MPSC 3.190 Data May 2010 - April 2012
20	Dec-11	****	MPSC 3.190 Data May 2010 - April 2012
21	Jan-12	****	MPSC 3.190 Data May 2010 - April 2012
22	Feb-12	****	MPSC 3.190 Data May 2010 - April 2012
23	Mar-12	****	MPSC 3.190 Data May 2010 - April 2012
24	Apr-12	****	MPSC 3.190 Data May 2010 - April 2012
25	2 Year Total	\$1,655,782	Sum of Lines 1-24
26	Normalized Annual	<b>\$827,891</b>	Line 25 ÷ 2