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APR 25 2007

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-325

Ref: Rebuttal Testimony of AmerenUE witness Mr. Desmond, page 3 (Impact of rate reductions)

At page 3 of his Rebuttal, Mr. Desmond states, "Local 2 supports AmerenUE's rate increase request because it will allow not only our members, but all of us who are the men and women of AmerenUE, to continue to provide the high quality service we have in the past, and more than ever need to do in the future." Please provide the following information:

- a. Has Mr. Desmond conducted any independent evaluation of the appropriate level of rate increase or reduction for AmerenUE in Missouri?
- b. If your response to part (a) is affirmative, please describe the analysis undertaken by Mr. Desmond and provide complete copies of all reports, studies, analyses, projections, workpapers and other documents relied upon by Mr. Desmond to conclude that "AmerenUE's rate increase request" is the appropriate revenue change at this time.
- c. Does Mr. Desmond believe that Local 2 members will not "continue to provide the high quality service we have in the past" if the Missouri PSC awards a different level of "rate increase" than the amount proposed by AmerenUE?
- d. If your response to part (c) is affirmative, explain and provide copies of all information relied upon in support of your response.

Response:

- a. No.
- b. n/a
- c. I testified that the rate increase would allow that quality service to continue. I am confident that Local 2 members will continue to provide the best service possible, but I am concerned that the rate decrease proposed by Staff would prohibit AmerenUE from investing in its system at the appropriate level.
- d. n/a

Prepared By: David Desmond

Title: Business Manager and Financial Secretary
IBEW Local 2

Date: February 17, 2007

State Exhibit No. 527
Case No(s). ER-2007-0002
Date 2-29-07 Rptr 28