Exhibit No.: Issue: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

Depreciation of Plant Jolie L. Mathis MoPSC Staff Direct Testimony ER-2007-0002 December 15, 2006

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

DIRECT TESTIMONY

OF

JOLIE L. MATHIS

UNION ELECTRIC COMPANY d/b/a AMERENUE

CASE NO. ER-2007-0002

Jefferson City, Missouri December 2006

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter on Union Electric d/b/a AmerenUE) for Authority to File Tariffs Increasing Rates for) Electric Service Provided to Customers in the) Company's Missouri Service Area.)

Case No. ER-2007-0002

AFFIDAVIT OF JOLIE L. MATHIS

STATE OF MISSOURI)) ss. COUNTY OF COLE)

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Jolie L. Mathis, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Direct Testimony in question and answer form, consisting of $_$ _____ pages to be presented in the above case; that the answers in the foregoing Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

Jolie L. Mathis

MAR BUT 2000 Subscribed and sworn to before me this $\underline{14}$ day of $\underline{4}$



Notary Public

TONI M. CHARLTON Notary Public - State of Missouri My Commission Expires December 28, 2008 Cole County Commission #04474301

1	DIRECT TESTIMONY
2	OF
3	JOLIE L. MATHIS
4	UNION ELECTRIC COMPANY
5	d/b/a AMEREN UE
6	CASE NO. ER-2007-0002
7	EXECUTIVE SUMMARY
8	DEPRECIATION STUDY
9	THEORETICAL RESERVE
10	RECOMMENDATION

1	DIRECT TESTIMONY
2	OF
3	JOLIE L. MATHIS
4	UNION ELECTRIC COMPANY
5	d/b/a AMEREN UE
6	CASE NO. ER-2007-0002
7	Q. Please state your name and business address.
8	A. Jolie L. Mathis, P.O. Box 360, Jefferson City, Missouri, 65102.
9	Q. By whom are you employed and in what capacity?
10	A. I am employed by the Missouri Public Service Commission (Commission) as a
11	Utility Engineering Specialist III in the Engineering and Management Services Department.
12	Q. What are your duties as a Utility Engineering Specialist III in the Engineering
13	and Management Services Department?
14	A. I am responsible for depreciation calculations and studies of companies
15	regulated by the Commission.
16	Q. Would you please state briefly your qualifications, educational background and
17	experience?
18	A. I graduated from Prairie View A&M University of Texas in August of 1993,
19	with a Bachelor of Science degree in Electrical Engineering. During my college years I was
20	employed as an engineering intern with Allied Signal Aerospace Company, Missouri Public
21	Service Company (now Aquila) and Sprint United Telephone Co Midwest Division (now
22	Embarq). In 1994 I accepted my current position. I have received formal training from
23	Depreciation Programs, Inc. and the Society of Depreciation Professionals. I have completed

the NARUC Annual Regulatory Studies Program, and attended numerous industry seminars
 in the electric, natural gas, water, sewer, and telecommunications areas.

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Q. Have you previously testified before the Commission?

A. Attached as Schedule JLM 1 to my direct testimony is a list of cases in which I have previously filed testimony.

6 EXECUTIVE SUMMARY

Q.

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Would you please summarize your direct testimony?

A. I conducted Staff's depreciation study of Ameren UE utility plant at
December 31, 2005. Based on that study the Staff is recommending to the Commission
depreciation rates which, when applied to the test year plant-in-service ending June 30, 2006,
decrease the currently ordered annual depreciation expense from \$331 million to
\$288 million, a reduction of approximately \$43 million.

13 I used the straight line method, broad group procedure and whole life technique in 14 performing this Staff depreciation study. The straight line method is a depreciation method 15 by which the service value of plant is charged to depreciation expense and credited to the 16 accumulated depreciation account through equal annual charges over its service life. Under 17 the broad group procedure, all units of plant within a particular depreciation category are 18 considered to be one group, usually a plant account or sub-account. The whole life technique 19 bases the depreciation rate on the estimated average service life of the plant. The Staff used 20 the following formula to determine the depreciation rates to be applied to the original cost of 21 plant:

22

Depreciation Rate = (100% - Net Salvage %) / Average Service Life

I also did a theoretical reserve study where I compared the actual accumulated reserve
 for depreciation to the reserve I calculated using the newly proposed life and salvage
 estimates I employed in the Staff's depreciation study. I used December 31, 2005, plant
 balances in the Staff's theoretical reserve study.

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DEPRECIATION STUDY

Q. When was the last time the Staff performed a depreciation study of
AmerenUE's electric plant?

A. Staff last performed a depreciation study in Case No. EC-2002-1.

Q. Did the Commission order depreciation rates in that case?

10 A. No. The Commission authorized Ameren UE to book effective April 1, 2002,
11 an annual negative amortization of \$20 million.

12 Q. When was the last time the Commission ordered depreciation rates for13 AmerenUE's electric plant?

A. The Commission last ordered depreciation rates in Case No. ER-83-163 on
July 6th, 1983. In its Report and Order, the Commission, among other things, directed that
"Union Electric shall implement and book new depreciation rates as of August 1, 1983, as
specified in paragraph 4 of the stipulation and agreement".

Q. Did the Staff perform a depreciation study of AmerenUE's electric utilityproperty for purposes of this rate case?

A. Yes. I performed a depreciation study based on Company records reflecting
data up to December 31, 2005.

22

Q. Are you familiar with AmerenUE's electric facilities?

1 A. Yes. The Staff has previously conducted field inspections and discussed plant 2 operations with local AmerenUE operators at all the major generating facilities; Callaway, 3 Labadie, Rush Island, Meramec, Sioux, Osage and Taum Sauk. 4 Q. You have used the term "depreciation study." What is the "depreciation" you 5 are studying? 6 The National Association of Railroad and Utilities Commissioners in 1958 A. 7 approved this definition of depreciation: 8 "Depreciation," as applied to depreciable utility plant, means the loss in 9 service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of utility 10 plant in the course of service from causes which are known to be in 11 current operation and against which the utility is not protected by 12 insurance. Among the cause to be given consideration are wear and 13 tear, decay, action of the elements, inadequacy, obsolescence, changes 14 15 in the art, changes in demand, and requirements of public authorities. [Source: Public Utility Depreciation Practices, August 1996, Published 16 by the National Association of Regulatory Utility Commissioners] 17 What ramifications does this definition have on the customer rates the 18 Q. 19 Commission sets? 20 A. This definition means that depreciation is a cost of providing service and that a 21 public utility should recover the capital invested in equipment needed to provide the required 22 service over the property's used and useful life. Since customer rates are based on a 23 12-month "test year," it is necessary to determine the depreciation that accrues during that 24 same 12-month "test year." 25 Q. How did you determine the annual accrual in this case? 26 A. I used the formula: 27 Depreciation Rate = (100% - Net Salvage %) / Average Service Life28 Q. What is "average service life"?

A. The average service life (ASL), in years, is the average expected life of all units of a group of property regardless of the placement date. The ASL is determined by actuarial analysis of records of annual additions, retirements by vintage and balances, as well as information provided by engineering and operations personnel. Survivor curve estimates from other electric companies are also considered.

6 Q. How did you determine the average service lives you used in Staff's7 depreciation study?

8

A. I used the retirement rate method.

9

Q. What is the retirement rate method?

10 A. The retirement rate method of life analysis is an actuarial method of 11 developing survivor curves using the average rate at which property is retired from each 12 experienced age group. Using the Gannett Fleming Software, AmerenUE historical mortality 13 data for an account is plotted and the stub curve (curve representing dollars surviving that 14 does not reach 0%) is compared to the known shape of a set of Iowa curves. Survivor curve 15 models, such as the Iowa curves, are widely used to simplify life analysis and forecasting. 16 These curves were developed at the Iowa State College's Iowa Engineering Experiment Three of the four families of curves include a base group of 17 Station 65 years ago. 18 176 industrial property mortality curves, and 18 types, published in Bulletin 125 of Iowa State 19 University's Engineering Research Institute, entitled "Statistical Analysis of Industrial 20 Property Retirements".

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The classification of the survivor curves was made according to whether the mode (highest point) of the frequency curves was to the left, to the right, or comparable with average service life. The result included six left modal (L0,L1,L2,L3,L4,L5); five right modal

(R1,R2,R3,R4,R5); and seven symmetrical curves (S0,S1,S2,S3,S4, S5,S6). In 1957, a fourth
 family was presented, consisting of the four O type survivor curves (O1,O2,O3,O4). Today,
 these survivor curve types are used extensively in public utility depreciation studies.

Q. Sometimes a picture is worth a thousand words. Do you have an example of a
plotted stub curve and of an Iowa curve that might aid someone in understanding what you
just said?

A. Yes. Attached as Schedule JLM 4 is one of the survivor stub curves I plotted
and, with it, a fitted Iowa curve.

Q. How are stub curves matched to Iowa curves?

10 A. Informed analyst judgment of which Iowa curve makes the best fit to the
11 plotted stub curve.

12 Q. How do the Iowa curves provide you with the average service life?

13 A. The area under the chosen Iowa curve represents the average service life.

Q. What information is useful to the analyst in evaluating which type of Iowacurve, with its life parameter, most nearly matches the stub survivor curve?

A. The most useful criterion used in determining a good fit is the square root of
the average difference squared between the percents surviving on the fitted smooth curve and
the stub curve. The lower this number, the better the match.

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Q. What is "net salvage"?

A. Net salvage is the gross salvage value of the property retired less the cost to
remove it (cost of removal).

22

Q. What is gross salvage?

- A. Gross salvage is the amount a utility records for the property when it is retired.
 Property is retired when it is sold, the utility is repaid for it by a third party, or it is reused.
- 3

Q. Is net salvage always a positive amount?

A. No. Negative net salvage occurs when the cost of removal exceeds gross
salvage; this is also referred to as net cost of removal or as net salvage expense.

6 Q. What is "net salvage percent" as used in the deprecation rate formula you7 stated earlier?

8

A. The ratio of net salvage to original cost multiplied by 100%.

9 Q. How did you determine net salvage percentages in the Staff's depreciation10 study?

A. For each account, I took the actual net salvage for the past 5 years and divided it by the original cost of plant retired during those same 5 years. For a few accounts, an unusually high or low net salvage amount was excluded to eliminate a percentage amount that may cause the average to become skewed.

Q. Did the Staff determine net salvage for in this case consistent with the Commission's statements regarding net salvage in its Third Report and Order issued January 11, 2005, in Case No. GR-99-315 (Laclede) and in its March 10, 2005, Report and Order in Case No. ER-2004-0570 (Empire)?

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A. Yes. At page 9, of its Third Report and Order, in Case No. GR-99-315 the Commission stated:

The Commission finds that the fundamental goal of depreciation accounting is to allocate the full cost of an asset, including its net salvage cost, over its economic or service life so that utility customers will be charged for the cost of the asset in proportion to the benefit they receive from its consumption.

1	Here, the Staff determined the net salvage by using the traditional accrual method,
2	where both gross salvage and cost of removal are reflected in the depreciation rates.
3	Q. How did the Staff determine depreciation rates for AmerenUE's Callaway
4	nuclear generation plant?
5	A. The Staff assumed the NRC will extend AmerenUE's Callaway nuclear plant
6	operating license for twenty years-from forty years to sixty years-therefore treating it as
7	lifespan property, with an estimated retirement date of 2044.
8	Q. What are the characteristics of life-span property?
9	A. Public Utility Depreciation Practices, published in 1996 by the National
10	Association of Regulatory Utility Commissioners states:
11	Life span property generally has the following characteristics:
12	i. Large individual units,
13	ii. Forecasted overall life or estimated retirement date,
14	iii. Units experience interim retirements, and
15	iv. Future additions are an integral part of initial installation.
16	Q. Would that not apply to other Steam Production plant such as Meramec, Sioux,
17	Labadie and Rush Island?
18	A. Yes, but history has shown us that these units continue to remain in operation
19	as long as it is economical and feasible to do so. A determination of the exact timing of the
20	retirement of a particular facility can only be made relatively close to the time of its
21	anticipated retirement date. Until that time, variables such as technology upgrades, regulatory
22	requirements, and power supply change over time. Because of these factors, the final

retirement date for steam production is not certain, and it is inappropriate to truncate the
 survivor curve at this time.

3 Q. But is it appropriate to truncate the curve to the year 2044 for nuclear4 production plant?

A. Yes, because we have sufficient basis to assume that with a license extension
of 20 years, all of nuclear production plant will be retired in the year 2044.

7

Q. What depreciation rates does the Staff recommend to the Commission?

8 A. Based on its depreciation study, the Staff recommends the Commission order
9 the depreciation rates shown in attached Schedule JLM 2.

10 Q. What impact do these depreciation rates have on AmerenUE's test year11 depreciation expense?

A. Based on the test year ended June 30, 2006, AmerenUE's currently ordered
annual depreciation expense should be decreased from \$331 million to \$288 million, a
reduction of approximately \$43 million.

15

THEORETICAL RESERVE

Q.

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What is "theoretical reserve"?

A. Theoretical reserve is the balance that would be in the accumulated
depreciation account if recommended, rather than current, depreciation parameters are used in
calculating accrued depreciation.

20

Q. Why is the theoretical reserve important?

A. The theoretical reserve is a deduction from rate base. It has to be as accurate
as possible.

Q. How well have the depreciation rates performed with respect to the theoretical
 reserve accrual?

A. The Staff's theoretical reserve for 2005 is \$3,559,684,994, which represents 33% of the original cost of AmerenUE's actual plant in service AmerenUE's actual 2005 reserve is \$4,325,788,188, which represents 41% of the original cost of AmerenUE's actual plant-in-service. Based on the Staff's depreciation study, AmerenUE's depreciation reserve is over accrued by \$766,103,194. The depreciation rates have been accruing at too high a level, and need to be slowed down.

9

What are the main reasons for this reserve imbalance?

A. There are several factors that contribute to this reserve imbalance; the
lengthening of average service lives since 1983, an increase in negative net salvage, and the
expected extension of the Callaway operating license.

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Q. What, if anything, should the Commission do because of this over accrual?

A. The Staff does not propose the Commission make any adjustment to the depreciation reserve at this time. Instead, the Commission should note the depreciation reserve imbalance and direct the Staff to continue to monitor the imbalance in future depreciation studies.

18 **<u>RECOMMENDATION</u>**

Q.

Q. What does the Staff recommend the Commission do based on the Staff'sdepreciation study?

A. The Staff recommends the Commission: (1) order the depreciation rates proposed in Schedule JLM 2, (2) order AmerenUE's electric depreciation expense to be \$288 million and (3) note the accumulated depreciation reserve over-accrual shown in

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1 Schedule JLM 3 and order the Staff to monitor the over accrual in future depreciation studies,

2 but make no adjustment to the depreciation reserve at this time.

- Q. Does this conclude your direct testimony?
- A. Yes, it does.

JOLIE MATHIS CASE PARTICIPATION

Date Filed	Issue	Case Number	Exhibit	Case Name
12/1/1995		TO96147	Direct	Alltel Missouri, Inc.
3/7/1996		GA96130	Rebuttal	Missouri Pipeline Company
3/7/1996		GA9711	Rebuttal	Missouri Pipeline Company
1/10/1997		GM9770	Rebuttal	Atmos Energy Corp. & United Cities Gas
6/26/1997		GR97272	Direct	Associated Natural Gas
5/13/19991	Depreciation of Plant	HR99245	Direct	St. Joseph Light & Power Company
6/25/1999I	Depreciation	WR99326	Direct	United Water Missouri, Inc.
	Amortization of Premature Retirement	SR2000282	Direct	Missouri-American Water Company
	Amortization of Premature Retirement	WR2000281	Direct	Missouri-American Water Company
7/2/2001 I	Depreciation of Plant	EC20021	Direct	Union Electric Company d/b/a AmerenUE
12/6/2001 I	Depreciation of Plant	EC2002265	Direct	UtiliCorp United Inc. d/b/a Missouri Public Service
12/6/2001 I	Depreciation of Plant	ER2001672	Direct	UtiliCorp United Inc. d/b/a Missouri Public Service
1/22/2002 I	Depreciation of Plant	EC2002265	Surrebuttal	UtiliCorp United Inc. d/b/a Missouri Public Serivce
3/1/2002 I	Depreciation of Plant	EC20021	Direct	Union Electric Company d/b/a AmerenUE
I	Depreciation - Net Salvage; Average Service Lives; Fheoretical Reserve	EC20021	Surrebuttal	Union Electric Company d/b/a AmerenUE
4/15/2004 I	Depreciation	GR20040209	Direct	Missouri Gas Energy
6/14/2004 I	Depreciation Rates	GR20040209	Surrebuttal	Missouri Gas Energy
10/14/2004I	Depreciation of Plant	HM20040618	Rebuttal	Trigen-Kansas City Energy Corp. and Thermal North America, Inc.

						DEPRECIATIO			ION SPREAD	SHEET								
A		Plant	1.16-	Ordered	Damma	Probable	1.16	Sta	aff's Proposal	Demme	Probable	1.160	Compa	any's Proposal		Ordered	Staff's	Increase /
Account No.	Title	Original Cost Jun-06	Life (Yr.)	Net Salvage (%)	Deprec. Rate (%)	Retirement Year (Staff)	Life (Yr.)	Curve	Net Salvage (%)	Deprec. Rate (%)	Retirement Year (Company)	Life (Yr.)	Curve	Net Salvage (%)	Deprec. Rate (%)	Annual Accrual	Annual Accrual	Decrease Accrual
	Meramec Steam Production Plant																	-
211	Structures & Improvements	36,898,059	35	(1)	2.89%		115	R1.5	(21)	1.05%	2026	120	S0	(19)	3.16%	1,066,354	387,430	(678,92
	Boiler Plant Equipment	399,232,426	32	(1)	3.19%		60	L0.5	(29)	2.15%	2020	60	L0.5	(19)	4.53%	12,735,514	8,583,497	(4,152,01
	Turbogenerator Units	82.051.879	35	2	2.80%		63	L0.5	(29)	1.70%	2026	70	L0.5	(19)	3.95%	2,297,453	1,394,882	(4, 152,01
	Acessory Electric Equipment	36,283,593	35	3	2.80%	-	90	R1		1.21%	2026	90	R1	(19)	3.83%	1,005,056	439,031	(902,57) (566,02
	Misc. Power Plant Equipment	13,708,320	29	6	3.24%		90 60	02	(9)	1.21%	2026	90 60	01	(19)	4.56%	444,150	242,637	(566,02) (201,51
310	Misc. Power Plant Equipment	13,708,320	29	0	3.24%		60	02	(6)	1.77%	2026	60	01	(19)	4.50%	444,150	242,037	(201,51
	Sioux Steam Production Plant																	
311	Structures & Improvements	25.295.269	35	(1)	2.89%		115	R1.5	(21)	1.05%	2026	120	S0	(21)	3.31%	731.033	265.600	(465,43
-	Boiler Plant Equipment	328.617.174	32	(2)	3.19%		60	L0.5	(29)	2.15%	2026	60	L0.5	(21)	4.30%	10.482.888	7,065,269	(3,417,61
-	Turbogenerator Units	91.440.550	35	2	2.80%		63		(7)	1.70%	2026	70	L0.5	(21)	4.54%	2,560,335	1,554,489	(1,005,84
	Acessory Electric Equipment	34,642,484	35	3	2.77%		90	R1	(9)	1.21%	2026	90	R1	(21)	4.39%	959.597	419.174	(540,42
	Misc. Power Plant Equipment	7,962,301	29	6	3.24%		60	02	(6)	1.77%	2026	60	01	(21)	4.39%	257,979	140,933	(117,04
1	Labadie Steam Production Plant																	
	Structures & Improvements	61,831,946	35	(1)	2.89%		115	R1.5	(21)	1.05%	2026	120	S0	(19)	3.19%	1,786,943	649,235	(1,137,70
	Boiler Plant Equipment	560,572,165	32	(2)	3.19%		60	L0.5	(29)	2.15%	2026	60	L0.5	(19)	3.73%	17,882,252	12,052,302	(5,829,95
	Aluminum Coal Cars	117,686,242	22	0	4.55%		22	R3	8	4.19%	2026	22	R3	30	3.18%	5,354,724	4,931,054	(423,67
	Turbogenerator Units	186,232,562	35	2	2.80%		63	L1	(7)	1.70%	2026	70	L0.5	(19)	4.13%	5,214,512	3,165,954	(2,048,55
	Acessory Electric Equipment	73,167,727	35	3	2.77%		90	R1	(9)	1.21%	2026	90	R1	(19)	3.47%	2,026,746	885,329	(1,141,41
316	Misc. Power Plant Equipment	17,242,739	29	6	3.24%		60	02	(6)	1.77%	2026	60	01	(19)	4.24%	558,665	305,196	(253,46
	Rush Island Steam Production Plant																	
311	Structures & Improvements	52.397.875	35	(1)	2.89%		115	R1.5	(21)	1.05%	2026	120	S0	(18)	3.09%	1,514,299	550,178	(964,12
	Boiler Plant Equipment	354,788,784	32	(1)	3.19%		60	L0.5	(29)	2.15%	2020	60	L0.5	(18)	3.77%	11,317,762	7,627,959	(3,689,80
	Turbogenerator Units	135,990,789	35	2	2.80%		63	L0.5	(29)	1.70%	2026	70	L0.5	(18)	4.03%	3,807,742	2,311,843	(1,495,89
	Acessory Electric Equipment	32.925.827	35	3	2.80%		90	R1	(7)	1.21%	2026	90	R1	(18)	3.62%	912.045	398.403	(1,495,69
	Misc. Power Plant Equipment	10,122,281	29	6	3.24%		90 60	02	(9)	1.21%	2026	60	01	(18)	4.37%	327,962	179,164	(148,79
	Common Steam Production Plant																	
	Structures & Improvements	1,959,206	35	(1)	2.89%		115	R1.5	(21)	1.05%	2026	120	S0	(5)	4.27%	56,621	20,572	(36,04
	Boiler Plant Equipment	37,071,156	32	(2)	3.19%		60	L0.5	(29)	2.15%	2026	60	L0.5	(5)	4.50%	1,182,570	797,030	(385,54
	Accessory Electrical Equipment	3,129,975	35	3	2.77%		90	R1	(9)	1.21%	2026	90	R1	(5)	4.38%	86,700	37,873	(48,82
316	Misc. Power Plant Equipment	20,843	29	6	3.24%		60	02	(6)	1.77%	2026	60	01	(5)	4.75%	675	369	(30
	Total Steam Production Plant	2,701,272,172														84,570,576	54,405,403	(30,165,17

						DEPRECIATIO	ON DET	ERMINA [.]	TION SPREAD	SHEET								
Account No.	Title	Plant Original Cost Jun-06	Life (Yr.)	Ordered Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Staff)	Life (Yr.)		aff's Proposal Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Company)	Life (Yr.)	•	any's Proposal Net Salvage (%)	Deprec. Rate (%)	Ordered Annual Accrual	Staff's Annual Accrual	Increase / Decrease Accrual
			(,	ea.ruge (,0,		i cui (cuii)	(,		Cuiruge (///	1000 (70)	· • • • · (• • • • • • • • • • • • • • •	(,		Callage (707	1000 (70)	100144	7100144	
Nuclear F	Production Plant																	
321 Structure	s and Improvements	893.268.025	40	0	2.60%	10-2044	100	R1	(3)	1.97%	10-2024	100	R1	0	2.82%	23,224,969	17,597,380	(5,627,589
322 Reactor F	Plant Equipment	957,550,064	40	4	2.60%	10-2044	60	S0	(37)	3.10%	10-2024	60	S0	0	3.38%	24,896,302	29,684,052	4,787,750
323 Turboger		494,453,935	40	0	2.60%	10-2044	100	S0	(3)	2.08%	10-2024	100	S0	0	3.18%	12,855,802	10,284,642	(2,571,160
324 Accessor	y Electric Equipment	210,754,954	40	1	2.60%	10-2044	80	R2	(2)	1.91%	10-2024	80	R2	0	2.74%	5,479,629	4,025,420	(1,454,209
	wer Plant Equipment	165,413,219	40	2	2.60%	10-2044	60	01	(1)	2.49%	10-2024	60	01	0	3.70%	4,300,744	4,118,789	(181,955
Total Nu	clear Production Plant	2,721,440,197														70,757,445	65,710,283	(5,047,162
Osage H	ydraulic Production Plant																	
331 Structure	s and Improvements	3,860,732	91	0	1.10%		150	R1.5	(41)	0.94%	2036	150	R1.5	(10)	1.86%	42,468	36,291	(6,177
332 Reservoi	rs, Dams, and Waterways	25,439,912	85	(1)	1.19%		180	R3	0	0.56%	2036	180	R3	(20)	1.74%	302,735	142,464	(160,271
333 Water W	heels, Turbines, and Generators	19,301,223	96	0	1.04%		125	S0	(161)	2.09%	2036	130	S0	(10)	2.44%	200,733	403,396	202,663
334 Accessor	ry Electric Equipment	4,112,456	90	(2)	1.13%		65	01	(9)	1.68%	2036	65	01	0	2.53%	46,471	69,089	22,619
335 Misc. Pov	wer Plant Equipment	1,773,982	74	5	1.28%		60	01	0	1.67%	2036	60	01	0	2.97%	22,707	29,625	6,919
336 Roads, R	Railroads, and Bridges	77,445	22	0	4.55%		60	SQ	0	1.63%	2036		SQ	0	1.25%	3,524	1,262	(2,261
Keokuk H	Hydraulic Production Plant																	
331 Structure	s and Improvements	4,117,339	91	0	1.10%		150	R1.5	(41)	0.94%	2036	150	R1.5	(10)	2.10%	45,291	38,703	(6,588
332 Reservoi	rs, Dams, and Waterways	12,367,195	85	(1)	1.19%		180	R3	0	0.56%	2036	180	R3	(20)	2.00%	147,170	69,256	(77,913
333 Water WI	heels, Turbines, and Generators	59,194,802	96	0	1.04%		125	S0	(161)	2.09%	2036	130	S0	(10)	3.05%	615,626	1,237,171	621,545
334 Accessor	ry Electric Equipment	9,167,068	90	(2)	1.13%		65	01	(9)	1.68%	2036	65	01	0	2.98%	103,588	154,007	50,419
335 Misc. Pov	wer Plant Equipment	2,631,559	74	5	1.28%		60	01	0	1.67%	2036	60	01	0	2.98%	33,684	43,947	10,263
336 Roads, R	Railroads, and Bridges	114,926	22	0	4.55%		60	SQ	0	1.63%	2036		SQ	0	1.98%	5,229	1,873	(3,356
Taum Sa	uk Hydraulic Production Plant																	
331 Structure	s and Improvements	5,503,349	91	0	1.10%		150	R1.5	(41)	0.94%	2036	150	R1.5	(10)	1.80%	60,537	51,731	(8,805
332 Reservoi	rs, Dams, and Waterways	27,586,615	85	(1)	1.19%		180	R3	0	0.56%	2036	180	R3	(20)	2.10%	328,281	154,485	(173,796
333 Water W	heels, Turbines, and Generators	37,356,989	96	0	1.04%		125	S0	(161)	2.09%	2036	130	S0	(10)	2.52%	388,513	780,761	392,248
	ry Electric Equipment	4,188,185	90	(2)	1.13%		65	01	(9)	1.68%	2036	65	01	0	2.58%	47,326	70,362	23,035
335 Misc. Pov	wer Plant Equipment	1,630,658	74	5	1.28%		60	01	0	1.67%	2036	60	01	0	3.11%	20,872	27,232	6,360
336 Roads, R	ailroads, and Bridges	45,570	22	0	4.55%		60	SQ	0	1.63%	2036		SQ	0	1.50%	2,073	743	(1,331
Total Hy	draulic Production Plant	218,470,005														2,416,827	3,312,399	895,572

					DEPRECIATIO	DET		TION SPREAD	SHEET								
Title	Plant Original Cost Jun-06	Life (Yr.)	Ordered Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Staff)	Life (Yr.)		aff's Proposal Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Company)	Life (Yr.)	•	any's Proposal Net Salvage (%)	Deprec. Rate (%)	Ordered Annual Accrual	Staff's Annual Accrual	Increase / Decrease Accrual
oduction Plant																	
s and Improvements	15,382,120	25	0	4.00%		60	S0.5	0	1.67%		35	SQ	(5)	2.86%	615,285	256,881	(358,403
lers, Products, and Accessories	12,264,732	25	0	4.00%		40	R4	0	2.50%		35	SQ	(5)	2.97%	490,589	306,618	(183,971
ns	583,616,964	25	0	4.00%		45	R4	0	2.22%		35	SQ	(5)	2.96%	23,344,679	12,956,297	(10,388,382)
y Electric Equipment	26,793,140	25	0	4.00%		53	R2.5	0	1.89%		35	SQ	(5)	2.89%	1,071,726	506,390	(565,335
wer Plant Equipment	5,665,300	25	0	4.00%		25	L0.5	0	4.00%		35	SQ	(5)	2.83%	226,612	226,612	0
· ·																	
ner Production Plant	643,722,256														25,748,890	14,252,799	(11,496,092)
sion Plant																	
s and Improvements	6,219,706	79	(5)	1.33%		60	R2	0	1.67%		60	R2	(5)	1.75%	82,722	103,869	21,147
quipment	181,457,965	50	0	2.00%		64	R2.5	(6)	1.56%		55	R2.5	0	1.82%	3,629,159	2,830,744	(798,415)
d Fixtures	70,903,822	50	7	1.86%		65	R4	(22)	1.88%		65	R4	(10)	1.69%	1,318,811	1,332,992	14,181
d Fixtures	113,204,654	43	(20)	2.79%		52	R4	(24)	2.38%		52	R4	(90)	3.65%	3,158,410	2,694,271	(464,139)
d Conductors and Devices	118,782,726	60	13	1.45%		55	R4	(2)	1.85%		55	R4	(25)	2.27%	1,722,350	2,197,480	475,131
nd Trails	71,788	50	0	2.00%		50	SQ	0	0.00%		50	SQ	0	1.20%	1,436	0	(1,436)
Insmission Plant	490,640,661														9,912,888	9,159,356	(753,531)
on Plant																	
s and Improvements	15,759,384	61	10	1.48%		60	R2.5	0	1.67%		60	R2.5	(5)	1.75%	233,239	263,182	29,943
quipment	531,174,647	44	(5)	2.39%		63	R2	(2)	1.62%		55	R2.5	(5)	1.82%	12,695,074	8,605,029	(4,090,045
owers, and Fixtures	657,866,888	34	(127)	6.68%		43	R3	(154)	5.92%		43	R3	(135)	5.47%	43,945,508	38,945,720	(4,999,788)
d Conductors and Devices	725,041,472	36	(15)	3.19%		46	R1.5	(52)	3.30%		47	R1	(50)	3.19%	23,128,823	23,926,369	797,546
und Conduit	172,578,086	84	(45)	1.73%		65	R3	0	1.54%		65	R3	(50)	2.31%	2,985,601	2,657,703	(327,898)
ound Conductors and Devices	459,391,695	45	22	1.73%		54	R2	(40)	2.59%		53	R2	(25)	2.36%	7,947,476	11,898,245	3,950,769
sformers	353,005,804	40	17	2.08%		42	R2.5	(1)	2.40%		45	L2	0	2.22%	7,342,521	8,472,139	1,129,619
d Services	126,844,186	36	(197)	8.25%		37	R2.5	(303)	10.86%		37	R2.5	(200)	8.09%	10,464,645	13,775,279	3,310,633
ound Services	121,695,103	45	(17)	2.60%		45	R3	(98)	4.39%		45	R3	(80)	3.99%	3,164,073	5,342,415	2,178,342
	103,953,475	36	1	2.75%		28	L2.5	2	3.50%		28	L2.5	0	3.57%	2,858,721	3,638,372	779,651
ons on Customer Premises	164,856	46	(1)	2.20%		28	01	0	3.55%		20	01	0	3.74%	3,627	5,852	2,226
hting and Signal Systems	101,695,076	23	(36)	5.91%		37	L0.5	(58)	4.27%		33	L1	(45)	4.39%	6,010,179	4,342,380	(1,667,799)
tribution Plant	3,369,170,672														120,779,486	121,872,683	1,093,197
phting a	nd Signal Systems	Customer Premises 164,856 nd Signal Systems 101,695,076	Customer Premises 164,856 46 nd Signal Systems 101,695,076 23	Customer Premises 164,856 46 (1) nd Signal Systems 101,695,076 23 (36)	Customer Premises 164,856 46 (1) 2.20% nd Signal Systems 101,695,076 23 (36) 5.91%	Customer Premises 164,856 46 (1) 2.20% nd Signal Systems 101,695,076 23 (36) 5.91%	Customer Premises 164,856 46 (1) 2.20% 28 nd Signal Systems 101,695,076 23 (36) 5.91% 37	Customer Premises 164,856 46 (1) 2.20% 28 O1 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58)	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27%	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27%	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 O1 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33 L1	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 O1 0 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33 L1 (45)	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 O1 0 3.74% nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33 L1 (45) 4.39%	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 O1 0 3.74% 3.627 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33 L1 (45) 4.39% 6,010,179	Customer Premises 164,856 46 (1) 2.20% 28 O1 0 3.55% 20 O1 0 3.74% 3.627 5,852 nd Signal Systems 101,695,076 23 (36) 5.91% 37 L0.5 (58) 4.27% 33 L1 (45) 4.39% 6,010,179 4,342,380

						DEPRECIATIO	DN DET	ERMINA	TION SPREAD	SHEET								
Account No.	Title	Plant Original Cost Jun-06	Life (Yr.)	Ordered Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Staff)	Life (Yr.)		aff's Proposal Net Salvage (%)	Deprec. Rate (%)	Probable Retirement Year (Company)	Life (Yr.)		ny's Proposal Net Salvage (%)	Deprec.	Ordered Annual Accrual	Staff's Annual Accrual	Increase Decrease Accrual
	General Plant																	
390.0	Structures and Improvements	171,487,901	41	6	2.29%		45	S0	(11)	2.46%		45	S0	(5)	2.33%	3,927,073	4,218,602	291,52
	Office Furniture and Equipment	44,289,607	28	8	3.29%		20	L0	0	5.00%		15	SQ	0	4.77%	1,457,128	2,214,480	757,35
	Mainframe Computers	422,014	*	*	3.29%		6	L0	0	16.67%		5	SQ	0	0.00%	13,884	70,350	56,46
391.2	Personal Computers	1,796,928	*	*	3.29%		9	L2	0	11.11%		5	SQ	0	19.42%	59,119	199,639	140,52
392.0	Transportation Equipment	83,429,052	11	12	8.00%		11	S0	7	8.41%		11	S0	9	8.23%	6,674,324	7,016,383	342,05
393.0	Stores Equipment	2,104,840	32	12	2.75%		25	L0	4	3.84%		20	SQ	0	3.71%	57,883	80,826	22,94
394.00	Tools, Shop and Garage Equipment	10,972,846	45	18	1.82%		30	L0.5	4	3.20%		20	SQ	0	4.34%	199,706	351,131	151,42
395.00	Laboratory Equipment	6,650,033	52	2	1.88%		26	L0	0	3.85%		20	SQ	0	4.48%	125,021	256,026	131,00
396.00	Power Operated Equipment	9,843,387	18	23	4.28%		15	L2	13	5.80%		15	L2	15	5.67%	421,297	570,916	149,61
397.00	Communication Equipment	128,018,518	30	(5)	3.50%		27	L1	0	3.70%		15	SQ	0	4.80%	4,480,648	4,736,685	256,03
398.00	Miscellaneous Equipment	641,398	20	5	4.75%		23	02	2	4.26%		20	SQ	0	4.84%	30,466	27,324	(3,14
	Total General Plant	459,656,524														17,446,549	19,742,363	2,295,81

Analyzed Totals

Column Totals

10,604,372,487

331,632,662 288,455,286 (43,177,376)

* Sub-account did not exist when the last depreciation rates were ordered in 1983

Union Electric Company, dba AmerenUE Case No. ER-2007-0002

Account No.	Title	Book Reserve Balance Dec 31 2005	Theoretical Reserve Balance Dec 31 2005	Difference	Under or OverAccrual
			200012000		
	Steam Production Plant				
	Meramec Steam Production Plant				
0.1.1		05 000 000	0.004.447	40.000.005	0.00
	Structures & Improvements	25,263,302	8,394,417	16,868,885	Over
	Boiler Plant Equipment	106,475,863	69,353,208	37,122,655	Over
	Turbogenerator Units Acessory Electric Equipment	48,578,106 20,649,350	17,419,607 6,346,626	31,158,499	Over Over
	Misc. Power Plant Equipment	4,171,242	1,217,186	14,302,724 2,954,056	Over
510		4,171,242	1,217,100	2,954,050	Over
	Sioux Steam Production Plant				
311	Structures & Improvements	14,050,331	4,733,268	9,317,063	Over
	Boiler Plant Equipment	102,713,609	64,137,771	38,575,838	Over
	Turbogenerator Units	28,261,696	12,190,819	16,070,877	Over
	Acessory Electric Equipment	11,833,776	4,083,579	7,750,197	Over
	Misc. Power Plant Equipment	2,339,741	808,867	1,530,874	Over
	Labadie Steam Production Plant				
311	Structures & Improvements	34,038,755	11,381,888	22,656,867	Over
	Boiler Plant Equipment	301,066,755	151,323,766	149,742,989	Over
	Aluminum Coal Cars	38,100,712	47,259,725	-9,159,013	Under
	Turbogenerator Units	67,328,387	31,720,942	35,607,445	Over
	Acessory Electric Equipment	38,251,100	12,910,881	25,340,219	Over
	Misc. Power Plant Equipment	7,341,846	1,941,374	5,400,472	Over
			, ,	, ,	
	Rush Island Steam Production Plant				
311	Structures & Improvements	31,645,884	10,041,911	21,603,973	Over
312	Boiler Plant Equipment	196,980,361	93,006,339	103,974,022	Over
314	Turbogenerator Units	53,484,413	24,219,734	29,264,679	Over
315	Acessory Electric Equipment	16,492,597	5,322,043	11,170,554	Over
316	Misc. Power Plant Equipment	4,266,116	1,057,750	3,208,366	Over
	Common Steam Production Plant				
	Structures & Improvements	219,563	75,488	144,075	Over
	Boiler Plant Equipment	4,537,148	2,992,835	1,544,313	Over
	Accessory Electrical Equipment	342,692	125,433	217,259	Over
316	Misc. Power Plant Equipment	2,438	674	1,764	Over
	Total Steam Production Plant	1,158,435,783	582,066,131	576,369,652	Over
	Nuclear Production Plant				
204	Structures and Improvements	440,030,469	291,000,765	140 020 704	Over
	Reactor Plant Equipment	284,736,650	364,569,355	149,029,704 -79,832,705	Under
	Turbogenerator Units	185,853,221	142,815,618	-79,832,705 43,037,603	Over
	Accessory Electric Equipment	105,053,221	71,730,417	36,522,442	Over
	Misc. Power Plant Equipment	32,314,189	36,449,694	-4,135,505	Under
020		02,011,100		1,100,000	011001

Union Electric Company, dba AmerenUE Case No. ER-2007-0002

Account No.	Title	Book Reserve Balance Dec 31 2005	Theoretical Reserve Balance Dec 31 2005	Difference	Under or OverAccrual
	Osage Hydraulic Production Plant				
		4 000 540	4 050 000	=1.400	
	Structures and Improvements	1,323,513 13,601,792	1,252,090	71,423 6,760,179	Over Over
	Reservoirs, Dams, and Waterways Water Wheels, Turbines, and Generators	6,980,750	6,841,613 8,133,720	-1,152,970	Under
	Accessory Electric Equipment	1,373,647	1,059,095	314,552	Over
	Misc. Power Plant Equipment	364,885	201,228	163,657	Over
	Roads, Railroads, and Bridges	115,104	63,923	51,181	Over
				- , -	
	Keokuk Hydraulic Production Plant				
331	Structures and Improvements	1,354,660	1,099,249	255,411	Over
	Reservoirs, Dams, and Waterways	5,716,963	2,919,957	2,797,006	Over
333	Water Wheels, Turbines, and Generators	5,533,101	10,394,544	-4,861,443	Under
334	Accessory Electric Equipment	788,470	1,211,779	-423,309	Under
335	Misc. Power Plant Equipment	660,867	284,061	376,806	Over
336	Roads, Railroads, and Bridges	54,102	50,972	3,130	Over
	Taum Sauk Hydraulic Production Plant				
004	Structures and Improvements	1.645.912	1 510 017	100.005	Over
	Structures and Improvements Reservoirs, Dams, and Waterways	9,785,912	1,518,917 4,972,983	126,995 4,812,934	Over
	Water Wheels, Turbines, and Generators	7,479,328	12,424,960	-4,945,632	Under
	Accessory Electric Equipment	1,129,100	879,083	250,017	Over
	Misc. Power Plant Equipment	509,509	146,641	362,868	Over
	Roads, Railroads, and Bridges	56,387	28,093	28,294	Over
	Total Hydraulic Production Plant	58,474,007	53,482,908	4,991,099	Over
	-	00,414,001	00,402,000	4,001,000	Over
	Other Production Plant				
341	Structures and Improvements	5,265,826	1,764,093	3,501,733	Over
342	Fuel Holders, Products, and Accessories	3,014,438	2,278,845	735,593	Over
	Generators	109,426,490	64,394,095	45,032,395	Over
	Accessory Electric Equipment	7,644,957	4,045,656	3,599,301	Over
346	Misc. Power Plant Equipment	959,166	627,723	331,443	Over
	Total Other Production Plant	126,310,877	73,110,412	53,200,465	Over
	Transmission Plant				
	Structures and Improvements	2,050,542	2,028,938	21,604	Over
	Station Equipment	57,763,437	41,663,321	16,100,116	Over
	Tower and Fixtures	41,274,010	38,811,021	2,462,989	Over
	Poles and Fixtures Overhead Conductors and Devices	42,267,580 43,131,874	35,464,879 48,694,261	6,802,701 -5,562,387	Over Under
	Roads and Trails	76,265	71,789	-5,502,387 4,476	Over
	Total Transmission Plant	186,563,708	166,734,209	19,829,499	Over
		100,505,700	100,7 34,209	15,025,455	Over
	Distribution Plant				
361	Structures and Improvements	4,953,060	4,929,789	23,271	Over
	Station Equipment	159,407,965	136,303,235	23,104,730	Over
	Poles, Towers, and Fixtures	520,097,324	559,313,888	-39,216,564	Under
365	Overhead Conductors and Devices	254,733,135	286,794,089	-32,060,954	Under
	Underground Conduit	57,721,787	38,287,196	19,434,591	Over
	Underground Conductors and Devices	134,015,952	146,862,338	-12,846,386	Under
	Line Transformers	107,491,678	120,822,423	-13,330,745	Under
	Overhead Services	145,720,361	194,764,214	-49,043,853	Under
	Underground Services	73,486,852	80,428,040	-6,941,188	Under
370	Meters	33,417,869	32,584,418	833,451	Over
074	Installations on Customer Premises	120,584	88,893	31,691	Over Over
	Street Lighting and Signal Systems	42.562.921	37.587.356	4.975.5051	Uver
	Street Lighting and Signal Systems Total Distribution Plant	42,562,921 1,533,729,488	37,587,356 1,638,765,879	4,975,565 - 105,036,391	Under

Union Electric Company, dba AmerenUE Case No. ER-2007-0002

Title	Book Reserve Balance Dec 31 2005	Theoretical Reserve Balance Dec 31 2005	Difference	Under or OverAccrual
Conoral Plant				
Structures and Improvements	46,077,375	48,464,812	-2,387,437	Under
Office Furniture and Equipment	24,084,713	9,767,710	14,317,003	Over
Mainframe Computers	422,014	168,806	253,208	Over
Personal Computers	584,257	296,183	288,074	Over
Transportation Equipment	30,127,187	30,364,111	-236,924	Under
Stores Equipment	1,324,092	566,778	757,314	Over
Tools, Shop and Garage Equipment	5,996,285	2,487,982	3,508,303	Over
Laboratory Equipment	3,347,588	1,372,192	1,975,396	Over
Power Operated Equipment	4,232,262	4,310,009	-77,747	Under
Communication Equipment	94,611,692	41,058,146	53,553,546	Over
Miscellaneous Equipment	279,472	102,877	176,595	Over
Total General Plant	211,086,937	138,959,606	72,127,331	Over
	General Plant Structures and Improvements Office Furniture and Equipment Mainframe Computers Personal Computers Transportation Equipment Stores Equipment Tools, Shop and Garage Equipment Laboratory Equipment Power Operated Equipment Communication Equipment Miscellaneous Equipment	TitleReserve Balance Dec 31 2005General Plant	Reserve Balance Dec 31 2005Reserve Balance Dec 31 2005General Plant	Reserve Balance Dec 31 2005 Reserve Balance Dec 31 2005 Difference General Plant

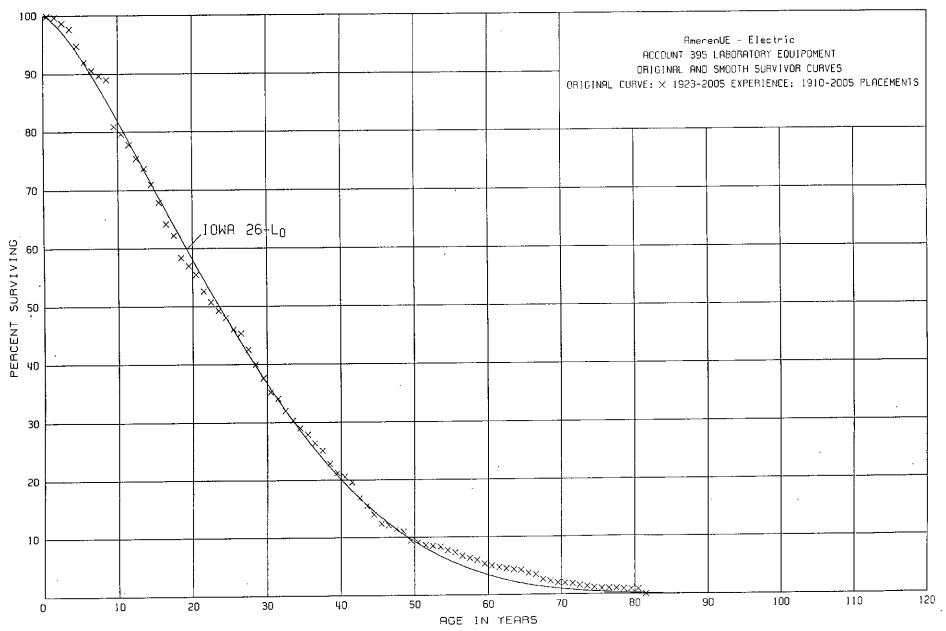
Column Totals

4,325,788,188

3,559,684,994

766,103,194

Over



Schedule JLM 4