BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Tariff Filings of Union Electric Company, d/b/a Ameren Missouri, to Increase Its Revenues for Retail Electric Service.	)))	File No. ER-2011-0028

NOTICE OF OFFER OF EXHIBIT 155

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and provides notice of the offer of Exhibit 155, which is an analysis relating to the savings relating to installing Stebbins tile in the Wet Flue Gas Desulfurization ("WFGD") units (the "scrubbers") at the Sioux Plant requested by Commissioner Kenney during the evidentiary hearing on the scrubbers issue in this case. In this regard, Ameren Missouri states as follows:

1. Submitted herewith is Exhibit 155, which consists of the results of an engineering and revenue requirement impact analysis of the savings relating to installing Stebbins tile in the scrubbers as a result of a lesson learned that the Ameren Missouri was able to take advantage of due to the slowdown in construction in the scrubber project in late 2008 and continuing into early 2009.

2. As shown on Exhibit 155, the analysis examined what Ameren Missouri's engineers believe would have been the need to replace the flake glass lining originally intended for the scrubbers as early as 2022 (after 12 years of scrubber operations) and no later than 2030 (after 20 years of scrubber operation).

3. In the "fixed" column, meaning that it is conservatively assumed that the power prices used in the analysis remain constant (i.e., remain fixed -- do not escalate) after 2014, the *annual* revenue requirement increase driven by the replacement of the flake glass lining that would have been necessary in 2011 dollars would be approximately $30.5 million (replacement

in 2022), $23.5 million (replacement in 2026), and $18.1 million (replacement in 2030), respectively.[1]

4. In the "not fixed" column, meaning that it is more realistically assumed that the power prices used in the analysis do not remain constant (i.e., do escalate) after 2014, the annual revenue requirement increase driven by the replacement of the flake glass lining that would have been necessary in 2011 dollars would be approximately $33.3 million (replacement in 2022), $30.2 million (replacement in 2026), and $32.8 million (replacement in 2030), respectively.

5. The second page of Exhibit 155 contains the assumptions relating to the actual repair itself, including that it would require approximately 157 days beyond the duration of a normal planned maintenance outage at the Sioux Plant to complete the replacement of the flake glass lining with Stebbins tile.

6. The Company has provided the workpapers underlying the analysis reflected in Exhibit 155 to the parties to this case.

7. The Company can, if the Commission so desires, make two witnesses with knowledge of the analyses that underlie Exhibit 155 available for questioning about Exhibit 155.

[1] The annual revenue requirement impact would mean that the total savings are far in excess of one year's savings, it being recognized that the annual figure will decline each year (assuming no change in the cost of capital) as the equipment depreciates, which will cause the return related to the equipment to be applied to a lower level of equipment investment. Please note that the annual revenue requirement associated with the approximately $33 million proposed disallowance would only be approximately 15-18% of that total disallowance, or $4.95 million to $5.94 million.

WHEREFORE, Ameren Missouri hereby offers Exhibit 155 for admission into the evidentiary record in this case, and asks that the same be admitted.

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 6th day of May, 2011.

/s/James B. Lowery
James B. Lowery

Cost Savings Realized by Change to Stebbins

Cumulative Present Worth of Revenue Requirements to Replace Flake Glass Lining

FORWARD PRICE CURVE		FIXED AT 2016	NOT FIXED
2022 (YR 12)	U1	$15,761,522	$17,509,020
	U2	$14,739,162	$15,825,409
		$30,500,684	$33,334,429
2026 (YR 16)	U1	$12,138,769	$15,907,195
	U2	$11,361,440	$14,375,061
		$23,500,209	$30,282,256
2030 (YR 20)	U1	$ 9,356,876	$16,267,030
	U2	$ 8,765,862	$16,515,413
		$18,122,738	$32,782,443

Assumes liner replacement required prior to 30-year life of scrubbers due to performance issues.

Analysis of Sioux Flake Glass Liner Replacement - 2011 $

TASK	COST	DAYS	SOURCE
Drain & Clean	$ 19,000.00	15	Duration based upon actuals from initial outage after WFGD placed in service and costs were estimated
Scaffolding	$ 225,000.00	12	PCR-095
Cover Scaffolding		4	2009 Avalotis FGD lining Schedule
Absorber Prep Work	$21,000.00	8	Ameren Calculation
Liner Removal	$ 740,000.00	30	Ameren Calculation
Surface Preparation Work	$ 140,000.00	25	Based on Devcon
Liner Installation	$ 2,300,000.00	89	Based on Devcon
Absorber Re-Install Work	$20,000.00	8	Ameren Calculation
Scaffold - Demob	Included in Scaffolding	7	
Close up & Re-fill Absorber	$ 5,000.00	4	Duration based upon actuals from initial outage after WFGD placed in service and costs were estimated
Schedule Contingency		10	Per - Ameren Scheduling
Major Boiler Outage Assumption		-56	Assumed 8 week outage
TOTALS	$ 3,470,000.00	157	

General Notes:

1. No by-pass to FGD. Either FGD operational or unit is off-line.
2. No liner inspections assumed outside normal outage scheduling.
3. Estimated power costs from Ameren forward power curve modeling.
4. Spray zone of vessel – (highest wear area) liner provider will not warrant the area.