Exhibit No.:

Issues: Transmission Additions;

MISO

Witness: Maureen A. Borkowski Sponsoring Party: Union Electric Company
Type of Exhibit: Direct Testimony
Case No.: ER-2007-0002

Date Testimony Prepared: July 5, 2006

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2007-0002

DIRECT TESTIMONY

OF

MAUREEN A. BORKOWSKI

ON

BEHALF OF

UNION ELECTRIC COMPANY d/b/a AmerenUE

> St. Louis, Missouri July, 2006

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1		DIRECT TESTIMONY	
2		OF	
3		MAUREEN A. BORKOWSKI	
4		CASE NO. ER-2007-0002	
5		I. <u>INTRODUCTION</u>	
6	Q.	Please state your name and business address.	
7	A.	Maureen A. Borkowski, Ameren Services Company ("Ameren Services"),	
8	One Ameren	Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.	
9	Q.	What is your position with Ameren Services?	
10	A.	I am the Vice President of Transmission of Ameren Services, which provides	
11	various corporate, administrative, and technical support for Ameren Corporation ("Ameren")		
12	and its affiliates.		
13	Q.	Please describe your educational background and employment	
14	experience.		
15	A.	In 1979, I graduated, cum laude, from the University of Notre Dame, Notre	
16	Dame, Indian	na, with a Bachelor of Science degree in Mechanical Engineering. In 1981, I	
17	joined Union Electric Company (now d/b/a as AmerenUE) ("AmerenUE" or "Company") as		
18	an engineer i	n the Betterment Engineering Department. I transferred to Corporate Planning	
19	and, in 1985,	, was promoted to Supervising Engineer with responsibility for sales and peak	
20	demand fore	casting. In 1988, I was promoted to Senior Supervising Engineer with	
21	responsibility	y for the development of demand side resources, load analysis and forecasting.	
22	In 1989, I wa	as promoted to Manager of Energy Supply Services with duties including the	
23	management	of the Company's wholesale power marketing activities, interconnection and	

- 1 transmission contract administration, and the preparation of the corporate fuel budget.
- 2 Subsequently, my duties were expanded to include natural gas supply and transportation
- 3 procurement. I also developed and implemented the Company's Open Access Transmission
- 4 Tariff in response to the Federal Energy Regulatory Commission's Order No. 888. In 1998, I
- 5 became Manager of Regulatory Planning and developed the tariffs, computer systems and
- 6 business procedures to implement electric retail choice in Ameren's Illinois service territory.
- 7 In 1999, I became Manager of the ARES Business Center, the Ameren Services business unit
- 8 implementing the Illinois retail choice program. In May of 2000, I departed Ameren
- 9 Services and subsequently formed my own consulting firm, Borkowski Enterprises, Inc.,
- providing consulting and expert witness services to energy industry clients on topics
- including transmission tariff interpretation, wholesale power contract disputes and Regional
- 12 Transmission Organization policy and implementation. In January, 2005, I returned to
- 13 Ameren Services in my current position.
- Q. What are your duties and responsibilities in your present position?
- 15 A. My current duties and responsibilities include the operation of the bulk
- transmission system for the four Ameren operating companies, transmission system planning,
- 17 the development of transmission policy and strategy, and the administration of transmission-
- 18 related regulatory activities, including the implementation of the transmission and ancillary
- services rate schedules of the Midwest Independent Transmission System Operator, Inc.
- 20 ("MISO").

1	Q.	Have you previously testified on electric issues before this Commission or	
2	any other sta	ate or federal regulatory body?	
3	A.	Yes. I have provided testimony before this Commission in matters regarding	
4	merger-relate	ed issues and service area certification. I have provided testimony before the	
5	Illinois Commerce Commission and the Iowa Utilities Board on matters concerning load		
6	forecasting, merger-related issues, and tariff and business practices related to retail choice. I		
7	have provide	d testimony before the Federal Energy Regulatory Commission regarding	
8	merger-relate	ed issues, open access transmission tariffs, and reactive power rates.	
9		II. PURPOSE AND SUMMARY OF TESTIMONY	
10	Q.	What is the purpose of your testimony in this proceeding?	
11	A.	The purpose of my testimony is to explain the changes in AmerenUE's	
12	Transmission Plant since 2001; to describe the transmission projects increasing the import		
13	capability int	o Missouri by 1300 megawatts ("MW") as agreed to in the Stipulation and	
14	Agreement in	Case No. EC-2002-1; and to explain how membership in the MISO is reflected	
15	in transmissio	on revenues and expenses during the test year. A summary of my testimony is	
16	included as A	Attachment A.	
17	Q.	Please summarize your testimony and conclusions.	
18	A.	AmerenUE has made significant investment in its transmission facilities to	
19	continue to p	rovide reliable service to its customers. From January 1, 2002, through March	
20	31, 2006, Am	nerenUE has increased the amount of its investment in Transmission Plant by	
21	\$107,062,057	7. This increase in transmission investment reflects in part AmerenUE's	
22	compliance v	with the stipulation in Case No. EC-2002-1, to increase its import capability into	
23	Missouri by 1	1300 MW.	

1	In addition, I summarize AmerenUE's test-year transmission revenues and	
2	expenses that had to be adjusted for known and measurable differences under MISO.	
3 4	III. CHANGES TO AMERENUE TRANSMISSION PLANT IN SERVICE SINCE 2001	
5	Q. Has AmerenUE made any changes to its investment in its transmission	
6	system since the last rate case?	
7	A. Yes. AmerenUE has made substantial new investment in its transmission	
8	facilities since 2001. As of January 1, 2002, the value of AmerenUE's total transmission	
9	plant in service was \$482,043,637 as listed in its FERC Form 1 filing for year-end 2002.	
10	Through March 31, 2006, AmerenUE made \$107,062,057 of additional investment in its	
11	transmission plant.	
12	Q. Please describe some of the major projects comprising additions to	
13	Transmission Plant.	
14	A. Some of the major projects in the additions to Transmission Plant completed	
15	as of year end 2005 include the new 345kV transmission line from Rush Island to St.	
16	Francois (\$16,345,200), the new Wildwood 345/138kV substation (\$16,102,000), and the	
17	third St. Francois-Rivermines 138kV line and associated substation upgrades (\$13,980,700).	
18	In addition, AmerenUE reconductored various 138kV and 161kV lines, increased the ground	
19	clearance on other lines, upgraded substation equipment and performed other system	
20	upgrades, replacements and additions in order to continue to provide reliable service to our	
21	customers.	
22	In the first half of 2006, AmerenUE has made additional transmission	
23	investment. For example, in June of 2006, we completed the construction of the Mariosa	
24	Delta-Apache Flats 161kV line and the associated substation work at Guthrie, Apache Flats	

- and the new Mariosa substation (\$16,509,200). Other projects completed through June of
- 2 2006 include the reconductoring of the Cahokia-Lemay Tap section of the Cahokia-Meramec
- 3 1 & 2 138kV lines (\$3,018,700), the reconductoring of Sioux-Roxford 1 & 2 138kV lines
- 4 (\$2,188,900) and the reconductoring of the Campbell-Maline 1 & 2 138kV lines
- 5 (\$1,742,800).
- 6 Q. Are there any other transmission investments that will be placed in
- 7 service by December 31, 2006?
- 8 A. Yes. AmerenUE is continuing to make investment throughout 2006 in its
- 9 transmission system. The Transmission Plant investment used in the revenue requirement in
- this case includes the transmission projects that will be placed in service in the second half of
- 11 2006. The most notable project included in this adjustment is the new Callaway-Loose
- 12 Creek–Franks 345kV transmission line and Loose Creek substation (total projected cost of
- 13 \$34,787,300).
- 14 Q. What is the FERC seven factor test?
- 15 A. The seven factor test is the method used by the FERC to classify investment in
- 16 facilities as either distribution or transmission.

1	Q. Are all of the transmission facilities included in the Transmission Plant
2	accounts recorded in FERC Form 1 properly classified as transmission investment,
3	consistent with FERC's seven factor test?
4	A. Yes. The facilities recorded as Transmission in the FERC Form 1
5	Transmission accounts are properly classified as transmission investment, consistent with
6	FERC's seven factor test.
7 8	IV. STATUS OF THE OBLIGATION TO INCREASE IMPORT CAPABILITY TO MISSOURI
9	Q. Can you describe the status of AmerenUE's obligation to increase the
10	import capability of its transmission system into Missouri?
11	A. In the last case where AmerenUE"s electric rates were examined, Case No.
12	EC-2002-1, AmerenUE agreed to increase its import capability into Missouri by 1300 MW.
13	Transmission planning studies at the time indicated that the imports from the east (Illinois)
14	were the most limiting. The Electric Planning Department identified the relevant constraints
15	limiting these imports and developed project descriptions to address these constraints and
16	increase AmerenUE's import capability by 1300 MW. Various transmission projects have
17	been completed to achieve this goal, including the reconductorings of the Cahokia-Lemay
18	Tap, Sioux-Roxford, and Campbell-Maline 138kV transmission lines. With the completion
19	of these projects, the increase in import capability of 1300 MW has been achieved, as agreed
20	to in the Stipulation and Agreement from that case.

1 2	V.	ADJUSTMENTS TO AMERENUE TEST YEAR TRANSMISSION REVENUES AND EXPENSES UNDER MISO
3	Q.	Did AmerenUE's transmission revenues and expenses have to be adjusted
4	for known a	and measurable differences during the test year related to MISO?
5	A.	Yes. AmerenUE witness Gary S. Weiss reflected various adjustments to
6	transmission	revenues and expenses in his calculation of AmerenUE's revenue requirement
7	necessitated	by the operation of MISO.
8	Q.	Could you explain the reasons for the most significant of these
9	adjustments	s?
10	A.	Yes. Several significant MISO-related adjustments were required.
11		MISO Schedule 18 Sub-Regional Rate Adjustment (SRA) and MISO
12		Schedule 19 Zonal Transition Adjustment (ZTA) are rate adjustment
13		mechanisms intended to recover lost transmission revenues of
14		Transmission Owners joining MISO. Schedule 18 and 19 charges are
15		collected from load and MISO Transmission Service customers, and
16		distributed to MISO Transmission Owners. The rate schedules for
17		SRA and ZTA were only in effect for a two-year transition period
18		ending September 30, 2005. Since all revenue and expenses from
19		SRA and ZTA have terminated and will not recur, we have not
20		included any revenue or expenses from these sources in the revenue
21		requirement in this case.
22		MISO Schedule 21 Interim SECA Charge Applicable to PJM Entities
23		and Schedule 22 SECA Charges to MISO Zones, Sub-Zones and
24		Customers are revenues and expenses respectively related to the

1	elimination of the "seam" with the PJM Interconnection. SECA is the
2	mechanism for recovery of certain lost transmission revenues resulting
3	from the elimination of the through and out rates for transactions
4	between MISO and PJM. Under Schedule 21, MISO collects revenues
5	from PJM zones, subzones and customers, and distributes that revenue
6	to the MISO Transmission Owners. Under Schedule 22, MISO
7	collects SECA charges from customers in its pricing zones and remits
8	payment to the PJM Transmission Owners. The SECA collection
9	period ended on March 31, 2006. As the SECA collection period has
10	ended and will not recur, neither SECA revenues nor expenses are
11	included in the calculation of the revenue requirement in this case.
12 •	Transmission service charges were eliminated under MISO Schedule 7
13	Long-Term Firm and Short-Term Firm Point-To-Point Transmission
14	Service and Schedule 8 Non-Firm Point-To-Point Transmission
15	Service for all transactions with Points of Delivery at the MISO border
16	to serve load within the PJM Interconnection as of April 1, 2006. This
17	is a permanent reduction of transmission revenues to the MISO
18	Transmission Owners, including AmerenUE.
19 •	MISO charges AmerenUE a load-based charge under Schedule 10 ISO
20	Cost Recovery Adder. This Schedule provides the cost recovery
21	mechanism for MISO to recover the costs of operating the Regional
22	Transmission Organization including its buildings, systems, other
23	capital costs and all operating expenses not related to the operation of

1		the energy market or the Financial Transmission Rights services. The
2		Schedule 10 charges are included as an expense in the calculation of
3		the revenue requirement in this case.
4	Q. Wh	nat other adjustments to AmerenUE's revenue requirements need to be
5	made to reflect ch	nanges in related to MISO revenues and expenses during the test year?
6	A. Bec	cause Ameren Services, as agent for AmerenUE and AmerenCIPS, is a
7	single transmission	n pricing zone under the MISO Tariff, any transmission revenues from
8	MISO must be allo	ocated between AmerenUE and AmerenCIPS. The allocation percentage
9	of revenues to Am	erenUE was updated as of January 1, 2006 to reflect the appropriate
10	percent of Transm	ission Plant investment.
11	Q. Doo	es this conclude your direct testimony?
12	A. Yes	s, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company 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 M	IAUREEN A. BORKOWSKI
STATE OF MISSOURI)) ss CITY OF ST. LOUIS)	
Maureen A. Borkowski, being first duly s	worn on her oath, states:
1. My name is Maureen A. B	orkowski. I work in the City of St. Louis, Missouri,
and I am employed by Ameren Services C	Company as Vice President of Transmission.
2. Attached hereto and made	a part hereof for all purposes is my Direct
Testimony on behalf of Union Electric Co	ompany d/b/a AmerenUE consisting of 9 pages and
Attachment A, both of which have been p	prepared in written form for introduction into
evidence in the above-referenced docket.	
3. I hereby swear and affirm	that my answers contained in the attached testimony
to the questions therein propounded are tr	ue and correct.
	Mourean & Torkowski
	Maureen A. Borkowski
Subscribed and sworn to before me this 5 th	day of July, 2006. Notary Public
Nota ST	LYN J. WOODSTOCK ry Public - Notary Seal ATE OF MISSOURI Franklin County ission Expires: May 19, 2008

EXECUTIVE SUMMARY

Maureen A. Borkowski

Vice President of Transmission Ameren Services

The purpose of my testimony is to explain the changes in AmerenUE's Transmission Plant since 2001; to describe the transmission projects increasing the import capability into Missouri by 1300 megawatts ("MW") as agreed to in the Stipulation and Agreement in Case No. EC-2002-1; and to explain how membership in the Midwest Independent Transmission System Operator, Inc. ("MISO") is reflected in transmission revenues and expenses during the test year.

AmerenUE has made significant investment in its transmission facilities to continue to provide reliable service to its customers. From January 1, 2002, through March 31, 2006, AmerenUE has increased the amount of its investment in Transmission Plant by \$107,062,057. This increase in transmission investment reflects in part AmerenUE's compliance with the Stipulation in Case No. EC-2002-1, to increase its import capability into Missouri by 1300 MW.

Various adjustments to transmission revenues and expenses in the calculation of AmerenUE's revenue requirement set out in the testimony of AmerenUE witness Gary S. Weiss were necessitated by the operation of MISO. Revenue and expenses related to rate adjustment mechanisms intended to recover lost transmission revenues of Transmission Owners joining MISO (MISO Schedules 18 and 19) have terminated and will not recur, and so have not been included in the calculation of the revenue requirement. Similarly, the

collection period for the recovery of certain lost transmission revenues resulting from the elimination of the through and out rates for transactions between MISO and PJM (MISO Schedules 21 and 22) has ended and will not recur, and so neither revenues nor expenses related to that process have been included in the calculation of the revenue requirement. Likewise, transmission service charges to serve load within the PJM Interconnection (MISO Schedules 7 and 8) were permanently eliminated. Additionally, charges reflecting the costs of operating the Regional Transmission Organization were included as an expense in the calculation of the revenue requirement under MISO Schedule 10. Finally, the allocation of MISO transmission revenues between AmerenUE and AmerenCIPS was updated as of January 1, 2006 to reflect the appropriate percent of Transmission Plant investment.