No. TMB-44

Data Information Request
From Union Electric Company d/b/a AmerenUE
MPSC Case No. EC-2002-1
For MPSC Witness Jolie L. Mathis

Requested From: Jolie L. Mathis

Requested By: Thomas M. Byrne

Date of Request: April 10, 2002

Information Requested:

For accounts in which the average life or type survivor curve that you are recommending differs from the average life and curve combination with the lowest residual measure from your analysis of data through 2000, please provide:

a) The name of the account;
b) The account number;
c) The name of the Iowa curve and service life that was the best mathematical fit for the account;
d) The residual measure for the Iowa curve that was the best mathematical fit for the account;
e) A description of the adjustment you made to the Iowa curve that was the best mathematical fit for the account and/or the related average service life for the account;
f) All of the reasons that support your adjustment to the Iowa curve that was the best mathematical fit for the account and/or the related average service life for the account. Where your adjustment is based in whole or in part on conversations with AmerenUE personnel, please provide the name and title of the AmerenUE employee involved in the conversation, the date of the conversation, and a summary of the conversation.

Response:

The attached information provided to Union Electric Company in response to the above Data Information Request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform Union Electric Company if, during the pendency of Case No. EC-2002-1 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location; (2) make arrangements with requestor to have documents available for inspection at a location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this Data Request, the term

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"document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to the person identified in the "Requested From" block above and all other employees, contractors, agents or others employed by or acting on behalf of the organization, group or governmental unit associated with that person. When used with respect to a natural person, "identify" means state his or her name, address, telephone number, current employer, job title, and current work telephone number.

Response Provided By: Jolie Mathis Date: 4/24/02
(Please print)

Signed By: Jolie Mathis

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Data Information Request
From Union Electric Company d/b/a Ameren UE
MPSC Case No. EC-2002-1
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Response:

a) Structures & Improvements
b) Account 311
c) 89.6 – S0.5
d) .43
e) 69 – R2.5
f) I chose the lowest residual measure in the R curve family over the S curve family, because it best captured the data at age 47 through 51, and best reflected the trend of plant data that more than likely would be experienced over the next 50 years.

a) Boiler Plant Equipment
b) Account 312
c) 68.0 – L0.5
d) 1.77
e) 54 – R1.5
f) I chose the lowest residual measure in the R curve family over the L curve family, because the data best reflected the trend of data from age 0 to 45 years, because the last 15 years were anomalous. The L0.5 curve in my opinion did not accurately reflect the retirements that plant data would experience. It is also comparable to the 54-year life that was recently ordered in the Empire District Electric Company Case No. ER-2001-299.

a) Turbogenerator Units
b) Account 314
c) 91.3 – R1.5
d) .70
e) 62 – R2.5
f) I chose a 62-year life because it best captured the data that dropped off between age 58 to 70, and I believed it to be more reasonable to assign a 62 year rather than 92 year life for turbine-generators. It is also comparable to Empire District Electric's 63-year life that was recently ordered in ER-2001-299.

a) Accessory Electric Equipment
b) Account 315
c) 81.8 – R2
d) 4.67
e) 55 – R3

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f) All residual measures for this account were large, therefore not providing a good mathematical fit in any curve family. I chose a 55 year life because it best captured the initial part of the curve from age 0 to 30 and then some additional data at age 59. 55 years is a very reasonable life for accessory electric equipment, and it is comparable to Empire District Electric's life of 51 years that was recently ordered in ER-2001-299.

a) Station Equipment
b) Account 353
c) 76.6 – R2
d) 1.07
e) 59 – R3
f) This survivor curve in my opinion best reflected data from age 0 to 40, before the last set of 23 years of anomalous data. The equipment more than likely will last longer than the currently prescribed 50 years, with plant still surviving that was placed in 1965.

a) Overhead Conductors & Devices
b) Account 356
c) 112.6 – L1
d) 1.85
e) 70 – R3
f) This survivor curve in my opinion best reflected data from age 0 to 55, before the last 30 years of anomalous data. This life is comparable to Empire District Electric's life of 70 years that was recently ordered in ER-2001-299.

a) Poles, Towers and Fixtures
b) Account 364
c) 42.5 – R2.5
d) 1.88
e) 41 – R2.5
f) The 41 year life curve remained a better fit, in my opinion, than the 42.5 year life.

a) Overhead Conductors & Devices – Distribution
b) Account 365
c) 57.6 – O2
d) 1.01
e) 48 – R0.5
f) This life and curve were simply the best visual fit for this data.

a) Underground Conduit
b) Account 366
c) 259.3 – R0.5
d) 1.01
e) 65 – R3

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f) All of the lives Gannett Fleming selected for this account were over 100 years, which I know is too long for Underground Conduit. Because of the extended length of the data, it was best to try to fit the data for the first 30 years of the curve. This life proves to be consistent with industry averages, as Kansas City Power & Light has a life of 75.3 years.

a) Overhead Services
b) Account 369.01
c) 38.1 – L2.5
d) 3.10
e) 37 – S1.5
f) The life selected is only one year off from the lowest residual measure life; the S curve is a better fit than the L curve.

a) Communication Equipment
b) Account 397
c) 16.7 – L5
d) 3.95
e) 18 - R4
f) I selected the R curve with the lowest residual measure, because it was a better visual fit from age 0 to 11 years.

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