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 |) | Case No. ER-2010-0036 |
| Rates for Electric Service Provided to Customers |) | |
| In the Company's Missouri Service Area. |) | |

NOTICE OF DEPOSITION AND SUBPOENA DUCES TECUM

You are hereby notified that counsel for the Staff of the Missouri Public Service Commission will depose Julie Cannell on Tuesday, March 2, 2010, in Conference Room 351 of the Wainwright State Office Building, located at 111 North 7th Street, St. Louis, Missouri 63101. Said deposition will commence at 8:30 a.m. and will continue until completed.

In addition, you are hereby notified that the deponent, Julie Cannell, is hereby directed to bring to the above-referenced deposition all documents and materials described in **Exhibit A**, attached hereto and incorporated by reference.

Respectfully submitted,

/s/ Eric Dearmont
Eric Dearmont

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of February, 2010.

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Exhibit A

- 1. Legibly printed copies of all workpapers prepared in the course of developing the deponent's Rebuttal Testimony in Case No. ER-2010-0036 and/or documents relied upon in preparing the deponent's Rebuttal Testimony in Case No. ER-2010-0036.
- 2. Electronic versions of all workpapers prepared in the course of developing the deponent's Rebuttal Testimony in Case No. ER-2010-0036 and/or documents relied upon in preparing the deponent's Rebuttal Testimony in Case No. ER-2010-0036, provided in a medium capable of reading by a Windows compatible computer, with formulas on any spreadsheets intact.
- 3. Complete copies of all correspondence, documents, reports, prior public utility commission rulings or cases, data request responses, periodic monthly reports, letters, calculations, plans, drawings and other information upon which the deponent relied in forming deponent's opinions set out in her Rebuttal Testimony in Case No. ER-2010-0036.
- 4. A complete list of all depositions given by the deponent within the last ten (10) years.
- 5. A complete list of all testimony submitted to or given by deponent before a state public utility regulatory commission, the Federal Energy Regulatory Commission, or the Energy Board of Canada, within the last ten (10) years.
- 6. A complete copy of the five (5) most recent rate case testimonies related to rate of return and/or cost of capital submitted to or given by deponent before a state public utility regulatory commission, the Federal Energy Regulatory Commission, or the Energy Board of Canada.
- 7. A copy of the deponent's current resume or curriculum vitae, including a reference to the date upon which the deponent earned her Chartered Financial Analyst (CFA) designation and proof of that the deponent is a current member in good standing.
- 8. Complete copies of all correspondence between Ms. Cannell and AmerenUE representatives and/or AmerenUE rate of return and/or cost of capital consultants conducted prior to the submission of her rebuttal testimony in Case No. ER-2010-0036.
- 9. A complete copy of Ms. Cannell's contract and/or other form(s) outlining the terms of engagement for her professional services related to Case No. ER-2010-0036.
- 10. A client list for J.M. Cannell, Inc. for services rendered over the last ten (10) years.
- 11. Complete copies of each of the articles cited on Page 3, Lines 4-6 of the Rebuttal Testimony of Julie Cannell, filed in Case No. ER-2010-0036.
- 12. Complete copies of the three (3) most recent reports published by J.M. Cannell, Inc. regarding investment management and/or investment results.

- 13. Documentation demonstrating the annual return results of all investment portfolios managed by the deponent over the past five (5) years.
- 14. Complete copies of each of the security analyst reports that have addressed the "regulatory situation" of AmerenUE as described on Page 4, Lines 3 and 4 of the Rebuttal Testimony of Julie Cannell, filed in Case No. ER-2010-0036.
- 15. A complete list all of the regulatory jurisdictions in the United States that offer "assurance of cost recovery," as mentioned on Page 15, Lines 18-20 of the Rebuttal Testimony of Julie Cannell, filed in Case No. ER-2010-0036, as well as a description of the specific regulatory mechanism used to assure such recovery.
- 16. A complete list of regulatory commissions in the U.S. categorized as to the relative constructive nature of regulation, as that term "constructive" is used on Page 6 at Lines 6 through 14 of the Rebuttal Testimony of Julie Cannell, filed in Case No. ER-2010-0036.
- 17. A complete copy of any and all analysis conducted by Ms. Cannell, EEI, or any investor advisory service that shows that utilities under regulation by utility commissions that are deemed <u>not</u> to be "constructive," have been unable to access the capital markets.
- 18. Complete copies of the Jesup & Lamont, Edward Jones, Hillard Lyons, J.P. Morgan, Citi, and Barclays Capital reports cited or referred to in the deponent's rebuttal testimony and any other reports reviewed by the deponent in the First Call/Thomson Reuters data base.
- 19. Copies of research reports authored or co-authored by the deponent as a securities analyst for the most recent five (5) years in which she was employed as such.