Exhibit No.:	
Issues:	*Depreciation: Net Salvage; Average Service Lives; Theoretical Reserve*
Witness:	*Jolie Mathis*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Surrebuttal Testimony*
Case Nos.:	*EC-2002-1*
Date Testimony Prepared:	*June 24, 2002*

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

SURREBUTTAL TESTIMONY

OF

JOLIE MATHIS

UNION ELECTRIC COMPANY
d/b/a AMERENUE

CASE NO. EC-2002-1

Exhibit No. 46
Date 7/10/02 Case No. EC-2002-1
Reporter KEM

Jefferson City, Missouri
June 2002

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

The Staff of the Missouri Public Service Commission,	)	Case No. EC-2002-1
Complainant,	)	
vs.	)	
Union Electric Company, d/b/a AmerenUE,	)	
Respondent.	)	

AFFIDAVIT OF JOLIE MATHIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Jolie Mathis, is, of lawful age, and on her oath states: that she has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 15 pages to be presented in the above case; that the answers in the following Surrebuttal 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 Mathis

Subscribed and sworn to before me this 24th day of June, 2002.

Toni M. Charlton

TONI M. CHARLTON
NOTARY PUBLIC STATE OF MISSOURI
COUNTY OF COLE
My Commission Expires December 28, 2004

TABLE OF CONTENTS OF

SURREBUTTAL TESTIMONY OF

JOLIE L. MATHIS

SURREBUTTAL TESTIMONY

OF

JOLIE L. MATHIS

UNION ELECTRIC COMPANY

d/b/a AMEREN UE

CASE NO. EC-2002-1

Q. Please state your name and business address.

A. Jolie L. Mathis, P.O. Box 360, Jefferson City, MO 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission (Commission) as a Utility Engineering Specialist III in the Engineering and Management Services Department.

Q. Are you the same Jolie L. Mathis who has previously filed direct testimony on behalf of the Staff of the Missouri Public Service Commission in this case?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. I will respond to the rebuttal testimony of William Stout, the Company's depreciation consultant.

Q. Which particular issues will you address?

A. I will address:

1. Net Salvage amounts in Distribution Plant
2. Staff's position on Net Salvage
3. Staff's determination of Average Service Lives

4. Staff's amortization of the Reserve Over-Accrual

5. company's Reserve Deficiency

NET SALVAGE AMOUNTS IN DISTRIBUTION PLANT

Q. Would you please define Net Salvage?

A. Net Salvage = Gross Salvage – Cost of Removal.

Q. Would you please define Net Salvage Cost?

A. Yes. A Net Salvage Cost occurs when the Cost of Removal exceeds the Gross Salvage, resulting in a negative net salvage.

Q. Are there any authoritative texts in depreciation that describe this occurrence?

A. Yes. In the Public Utility Depreciation Practices NARUC text it states:

> It is frequently the case that net salvage for a class of property is negative, that is, cost of removal exceeds gross salvage. This circumstance has increasingly become dominant over the past 20 to 30 years; in some cases negative net salvage even exceeds the original cost of plant. Today few utility plant categories experience positive net salvage; this means that most depreciation rates must be designed to recover more than the original cost of plant. The predominance of the circumstance is another reason why some utility commissions have switched to current-period accounting for gross salvage and, particularly, cost of removal.

Although the Commission has not been able to conduct a thorough review of all the state commissions, it is apparent from the above quote that this approach is being applied to other jurisdictions.

Q. In Mr. Stout's depreciation study, performed on behalf of Ameren UE, is there any particular part of plant where negative net salvage is predominant?

A. Yes, that would be Distribution Plant.

Q. Would you please tell us how much the Company is asking for in Net Salvage Cost for Distribution Plant?

A. Yes. The amount is approximately $35 million on an annual basis related to future cost of removal for distribution plant.

Q. And which accounts make up a significant portion of that $35 million?

A. For Account 364 Poles & Fixtures, the Company is requesting an annual accrual amount for net salvage of approximately $17 million. Account 365 Overhead Conductor & Devices, $6 million, Account 369 Overhead Services, $5 million, and Account 367 Underground Conductors & Devices, $2 million. These four accounts total $30 million in annual net salvage dollars requested by the Company.

Q. Have you prepared an analysis of a distribution account that better illustrates the impact of the Company's proposal regarding net salvage?

A. Yes. Schedule 1 attached to my testimony presents an analysis of the impact of the Company's position based upon actual information for Account 364, Poles & Fixtures. Company data supporting this schedule was provided in the Company's Depreciation Study, pages III-181 and III-182, presented in my surrebuttal as Schedule 2. This is the distribution plant account that has the greatest amount of future cost of removal in the Company's proposal. This schedule indicates that consumers will be paying approximately $14 million dollars in excess of the Company's actual costs each year, for this account alone, if Mr. Stout's depreciation rates are adopted. In other words, AmerenUE is proposing to charge its customers approximately four times its actual costs to remove poles and fixtures on an annual and recurring basis.

Q. Does the company provide enough evidence to support the large negative net salvage percentages that generate these dollars?

A. No. In FERC Form 1, Annual Report (Page 219), for the years 1990 to 2000, Net Salvage Expense in total, for all Company accounts, for each year is reported as being between $8 and $12 million. Mr. Stout states in his Rebuttal Testimony, pg. 15, Line 26, "The net salvage accrual exceeds the net salvage cost because of system growth and maturity...the size of the system has doubled in the past 40 years." System growth does not provide evidence that a negative 135 percent net salvage for Poles & Fixtures, or a negative 180 percent net salvage for Overhead Services will be required in the future.

Q. Does Mr. Stout talk about the basis of his estimates of Net Salvage in his depreciation study?

A. Yes. He states on pg. II-26 of his depreciation study that, "The estimates of net salvage were based on judgment which considered a number of factors. The primary factors were the analyses of historical data, the impact of the age of retirements and inflation on net salvage, knowledge of management's plans and operating policies determined during the management meeting, field trip and other discussions, a general knowledge of the electric industry, and net salvage estimates used by other electric companies."

Q. Do those factors allow as prediction of what cost of removal will be in upcoming years to be made with reasonable accuracy?

A. No. It is impossible to project with reasonable accuracy future gross salvage and cost of removal based on any of those factors.

Q. Does Mr. Stout go into detail on any of the accounts?

A. Yes. For example, for Account 365, Overhead Conductors he merely states that, "The range of typical net salvage estimates for overhead conductors is negative 20 percent to negative 50 percent." He also asserts that the remaining accounts are determined in a similar fashion, incorporating historical indications, and ranges of estimates used by other electric companies. Mr. Stout fails to include in his depreciation study how the electric companies he uses for analogy are similar to Ameren UE's plant.

Q. In Mr. Stout's rebuttal testimony, Schedule 6, he compares future estimated net salvage costs and net salvage accrual during the period 2001 through 2094 for Account 365. How representative is that example to on-going real life situations?

A. This example treats Account 365, Overhead Conductors & Devices as a dying account (i.e. there are no additions). This example is not applicable to this account because this is still a growing account (i.e. there are plant additions). This assumption underestimates the amount of negative net salvage , Overhead Conductors & Devices as a dying account (i.e. there are no additions). This example is not applicable to this account because this is still a growing account (i.e. there are plant additions). This assumption underestimates the amount of negative net salvage that will be accrued (i.e. paid by consumers) as reflected in the "net salvage accrual" column.

This schedule assumes that rates charged to customers are reduced each year to reflect the decrease in the "Net Salvage Accrual" shown in this schedule. The more probable result is that consumers would pay the $6,139,173 if Mr. Stout's depreciation rates are adopted and the Company would keep the annual reductions in this accrual in subsequent years as increased profit.

This schedule does not match the actual experience in this account as reflected on page III-183 of Schedule 1 in his rebuttal testimony. Further, this page shows that retirements do not follow the ever-increasing trend shown in the "Retirements" column of Mr. Stout's Schedule 6-1. Both of Mr. Stout's schedules are presented as Schedules 3 and 4, respectively in my surrebuttal testimony. Actual retirements fluctuate and reach their highest level in 1989 or 11 years prior to year 2000, the date ending Mr. Stout's study. Page III-183 of Mr. Stout's study also indicates that net salvage is not proportional to retirements. This is evidenced by the percentage (PCT) of net salvage to retirements that ranges from +11% to –112%.

Actually, page III-183 of Mr. Stout's study shows that the amount of net salvage is fairly constant and is independent of the dollar value of retirements. This supports the validity of Staff's proposal to establish cost of removal based upon actual experience verses the AmerenUE proposal to base cost of removal on a percentage of retired plant methodology.

Q. Does Mr. Stout present enough evidence to support a $35 million increase in net salvage accrual?

A. No, he does not.

STAFF'S POSITION ON NET SALVAGE

Q. Would you please restate your recommendation for the treatment of net salvage in this case?

A. Yes. Again, the whole life depreciation rate formula is:

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

Staff is proposing a removal of the net salvage factor from the whole life formula for depreciation rate determination. Depreciation should be the determination of average service life and a subsequent depreciation rate that recovers the capital cost of the original investment. Again, as I quoted Public Utility Depreciation Practices NARUC on page 2, over the past 20 to 30 years, the cost of removal has exceeded the gross salvage, resulting in depreciation rates that have to recover more than the original cost of plant. This is why Staff is proposing current-period accounting for net salvage.

Q. Mr. Stout makes the statement beginning on page 4, line 22 of his rebuttal testimony, that, "Ms. Mathis has proposed a radical departure from the traditional approach to recognizing net salvage in the depreciation rate formula..." Is Mr. Stout's assessment correct?

A. No. Mr. Stout's assessment is incorrect and misleading in several respects. Staff's approach to recommending depreciation rates in this case is consistent with its approach in numerous previous cases, including other electric companies that have been before the Commission in rate proceedings. Specifically, Staff's depreciation approach and methodology is consistent with that recommended by the Staff for cases involving other Missouri-PSC regulated electric companies including Missouri Public Service, Empire District Electric and natural gas companies including Laclede Gas and Missouri Gas Energy.

While Staff's methodology is a departure from the 'traditional' depreciation formula that includes a component for future and estimated net salvage that may or may not occur, Staff's recommendation in these cases has been to allow the Companies to recover the original cost of their investment over the average service life of

that investment. In addition, Staff's methodology recommends that Companies be allowed to recover actual net salvage cost on a current basis by treating net salvage as an expense.

In Staff's judgment, its recommended methodology for the development of depreciation rates is a more reasonable method for determining depreciation rates that serve as the basis for utility rates that Ameren UE customers will pay in their monthly bills.

Q. Has the Commission ruled on the net salvage issue in previous cases?

A. Yes. In Case No. GR-99-315, Laclede Gas Company, the Commission ruled that current depreciation rates should reflect a net salvage component of the depreciation rate that, when multiplied by the plant balance, gives an annual accrual consistent with the current net salvage amount experienced by the Company. More recently, in Case No. ER-2001-299, The Empire District Electric Company, the Commission found "that net salvage cost considered in setting rates should be based on historical net salvage cost that Empire has actually incurred in the recent past and that it should be treated as an expense."

Q. The Report And Order in WR-2000-844, St. Louis County Water Company supported the Company's position regarding depreciation rates, which included a component for future net salvage. Can you provide any additional information regarding the Commission's support for the Company's position in this case?

A. Yes. The Commission stated in the Report And Order in WR-2000-844:

> There is ample factual support to allow the Commission to choose either Staff's approach or the Company's. Under the circumstances faced by the Company including its need for cash flow to address its infrastructure issues, the Commission concludes that using the

> whole life method and including estimated net salvage is in the public interest.

Further, the Order went on to say:

> The Commission's conclusion about the use of the (traditional) whole life method should not be taken as a final endorsement of it, nor as a condemnation of Staff's approach. Both have merit, and the Commission will use the one that fits the particular circumstances under investigation.

The Order clearly states that enough evidence was provided by both the Company and the Staff to allow the Commission to support the position of either. Cash flow was a concern at St. Louis County Water Company and the Commission supported the Company's higher depreciation rates to provide greater cash flow. The Commission further ordered that any excess collection must be held in a storage fund and only used for infrastructure replacement.

Q. Do any authoritative texts mention the approach to net salvage that you are proposing?

A. Yes. On pg. 157 of Public Utility Depreciation Practices (1996), it reads:

> Some commissions have abandoned the above procedure and moved to current-period accounting for gross salvage and/or cost of removal. In some jurisdictions gross salvage and cost of removal are accounted for as income and expense, respectively, when they are realized. Other jurisdictions consider only gross salvage in depreciation rates, with the cost of removal being expense in the year incurred.

Q. How does this treatment of net salvage benefit the Company and the customer?

A. It ensures that the ratepayer pays costs that are actually incurred, and that the Company recovers its actual cost of removal less gross salvage.

STAFF'S DETERMINATION OF AVERAGE SERVICE LIVES

Q. Mr. Stout makes the statement beginning on page 5, line 1, "Mrs. Mathis had determined average service lives by relying almost entirely on analyses of historical data and ignoring other relevant information..." Is his statement true?

A. No. As indicated on page 3 of my March 2002 testimony, line 8, I conducted field inspections and discussed plant operations and plans for property retirement at Ameren UE's four coal fired plants and two hydroelectric plants. In addition, I reviewed depreciation work including Staff's proposed and Commission ordered rates for other Missouri electric utilities. As I stated previously in my direct testimony, pg. 5 lines 7 through 11, the ASL (Average Service Life) 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. Also, survivor curve estimates from other Missouri PSC regulated electric companies were also considered.

Q. When you mention that you performed an actuarial analysis of plant accounts, are you referring to all 51 accounts?

A. No. I am referring to the 26 accounts that I actually chose to work on for this case. The prescribed lives in the remaining 25 accounts remained as ordered in Case No. ER-83-163. I did not perform an actuarial analysis on those 25 smaller accounts.

Q. Did you consider information provided by engineering and operations personnel when touring Ameren UE plant in your estimation of average service lives?

A. Yes. I used engineering judgment, by taking into consideration the type of plant, how it operates, and how long it will last to confirm or modify the results of the statistical analysis of Ameren UE's mortality data.

Q. Would you please state the difference in the dollar amount of the life estimate between Staff and Company for Steam Production Plant?

A. The Company is requesting $28 million more than Staff due to estimated retirement dates for Meramec, Sioux, Venice, Labadie and Rush Island.

Q. How did the Company determine their retirement dates for each particular plant?

A. Mr. Stout stated that they are based on life spans that range from 50 to 61 years and average 54 years. He also states that Ameren UE's management participated in the development of those dates and that they are consistent with the Company's resource plan. He also used the life spans experienced by other electric utilities, and refers to life descriptions in the rebuttal restimony Garry L. Randolph.

Q. What does Mr. Stout state about Staff's treatment of Production Plant?

A. Of all of Mr. Stout's statements, perhaps the most misleading is his statement on pg. 5 line 2 that [Staff's] "...estimated survivor characteristics for production plant that do not incorporate the final concurrent retirement of all facilities at the end of a unit's life..." This sentence implies that production plant dates are known or at a minimum, can be estimated within a close range of precision. As is the case with Ameren UE facilities and two separate depreciation studies performed by the Company, this has clearly not been the case.

Q. Please describe the two depreciation studies you are referring to and the discrepancies that exist that relate to Mr. Stout's statement.

A. On January 22, 2002, Ameren UE submitted its depreciation study consistent with the Missouri Public Service Commission Rule, 4 CSR 240-20.030 that requires electric companies to submit depreciation studies every five years. The difference in some production plant lives presented in the Company's January 22, 2002 study and those presented in the Company's study filed in Case No. EC-2002-1 four months later on May 10, 2002, provide clear indication of the difficulty and imprecision in determining final plant retirement dates.

Specifically, there are significant differences between the Company's two studies with respect to what the Company terms "Probable Retirement Dates" for its hydraulic production plant. The very term "Probable Retirement Dates" indicates that the true dates of plant retirement are unknown and retirement date plans and commitments are subject to change. In the two depreciation studies, the Company's three hydro plants have differing retirement dates; two of the three plant retirement dates had significant life extensions, yet both studies were based upon December 31, 2000 plant data. In addition, Venice Steam Production Plant life was reduced six years.

Specific retirement date differences are presented in the following:

Retirement Dates

	Jan. 22nd Study	May 10th Study
Osage	2031	2036
Keokuk	2013	2028
Taum Sauk	2010	2040
Venice	2010	2004

These changes in retirement dates are addressed in Company correspondence, attached as schedule 5.

Q. Did the Company provide sufficient information for the estimation of retirement dates, in your opinion?

A. No. This issue will be addressed in the separate surrebuttal testimony of Staff witness Rosella L. Schad.

Q. Did you solely rely on the curve fitting results performed by Gannett-Fleming software for the Production Plant Accounts in your analysis?

A. No. The results of the Gannett-Fleming analysis resulted in ASLs that were longer than my proposed ASLs. For example in Account 311, Structures & Improvements, if I had relied strictly on computer software results, the life would have been 120 years. I considered many other factors to conclude that a 69-year ASL is appropriate. Other factors I considered were the plant mix of the account and the engineering judgment of the plant during site visits, plus discussions with other engineers in my department about an appropriate life. This method was followed for all Production Plant accounts, and many other accounts that were analyzed.

Q. Do you recognize the life span method as appropriate for production plant facilities?

A. Only when the retirement date of that plant can be clearly determined. Rosella Schad addresses the Company's retirement dates for production plant accounts in surrebuttal testimony filed in response to Garry L. Randolph and William Stout, P.E.

Q. When was the last time depreciation rates were prescribed for Ameren UE?

A. Depreciation rates were last ordered in Case No. ER-83-163 on July 6, 1983, excluding Callaway Nuclear Power Plant and the coal cars account.

Q. Is it important that new depreciation rates are prescribed in this case?

A. Yes. It has been almost 20 years since depreciation rates were last ordered for this Company. Staff's proposed depreciation rates in this proceeding will reflect the expected lives of plant currently in service.

STAFF'S AMORTIZATION OF THE RESERVE OVER-ACCRUAL

Q. Would you please restate the reserve deficiency in this case?

A. Yes. The actual December 31, 2000 reserve accrual for the 26 accounts is $2,480,149,133. The Staff's theoretical reserve for these 26 accounts is $1,498,481,336. The Company is over-accrued by $981,667,797, nearly $1 billion.

Q. What is your recommendation again for the treatment of this over-accrual?

A. Due to the size of the over-accrual, ($981,607,797 / 40yrs). Staff recommends an amortization period of 40 years, or $24,541,695 per year. This time period is sufficient in length to allow the over-accrual to be corrected while allowing adjustments to be made to depreciation rates if lives change during future rate cases.

A. How much of the over-accrual amount is related to the exclusion of net salvage from the whole life depreciation formula?

A. Approximately one-half is tied to the removal of net salvage from the formula, and the remaining half to the life parameters.

COMPANY'S RESERVE DEFICIENCY

Q. Did the Company determine that the actual reserve was over-recovered or under-recovered?

A. Because the Company used the "traditional" whole life technique, they concluded that the actual accrual was under-recovered.

Q. What is the Company' reserve deficiency number?

A. The Company calculated a theoretical reserve as of December 31, 2000 of $3,668 million and compared it to a booked reserve of $3,571 million. This resulted in an under-accrual of $97 million. The Company's recommendation is a 20-year amortization of approximately $5 million per year.

Q. Is the Company under-accrued, in your opinion?

A. No. The inclusion of net salvage in their "traditional" calculations and their estimated retirement dates for Production Plant results in high depreciation rates. These high depreciation rates result in a theoretical reserve amount that is unreasonably high. The Company is over-accrued, not under-accrued.

Q. Does this conclude your surrebuttal testimony?

A. Yes, it does.

Account 364
Poles & Fixtures

Analysis of Company Proposal:

Plant Data

Plant Balance =	$546,868,973
Company's Proposed Plant ASL =	43 years
Company's Proposed Net Salvage =	<135%>
Company's Proposed Depreciation Rate =	5.48%

Traditional Whole Life Depreciation Method

Depreciation Rate = (100% - <135%>) / 43 years
= (100% + 135%) / 43 years
= 235% / 43 years
= 5.48 % Depreciation Rate

Company Proposed Total Depreciation Expense = Depreciation Rate * Plant Balance
or $546,868,973 * 5.48% = $29,968,420

5.48% is the Company's Proposed Depreciation Rate for recovery of original plant cost and net salvage. Of the 5.48%, 2.33% is the Company's depreciation rate for recovery of original plant cost or $12,742,047, while 3.15% is the Company's Depreciation Rate for Net Salvage or $17, 226,373.

$29,968,420 (Company Proposed Annual Depreciation Expense)
-$12,742,047 (Company Proposed Life)
$17,226,373 (Company Proposed Net Salvage)

10 Year Average for Net Salvage was $3,001,593*

$17,226,373
- $3,001,593
$14,224,780 Excess Annual Accrual for Net Salvage

2000 Actual Net Salvage was $2,776,018*

* Mr. Stout's Depreciation Study, Page III-181

In Summary:
The Company will recover in excess of $14 million annually for account 364.

AMERENUE

ACCOUNT 364 POLES & FIXTURES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL AMOUNT	PCT	GROSS SALVAGE AMOUNT	PCT	NET SALVAGE AMOUNT	PCT
1961	834,521	833,351	100	9,455-	1-	842,806-	101-
1962	1,041,659	817,839	79	267,488	26	550,351-	53-
1963	1,029,884	945,771	92	96,041	9	849,730-	83-
1964	1,046,121	864,792	83	83,101	8	781,691-	75-
1965	915,668	758,901	83	45,707	5	713,194-	78-
1966	1,345,111	924,557	69	66,211	5	858,346-	64-
1967	1,357,256	786,350	58	78,712	6	707,638-	52-
1968	1,143,577	725,583	63	46,766	4	678,817-	59-
1969	1,141,723	724,470	63	62,323	5	662,147-	58-
1970	807,960	624,649	77	33,935	4	590,714-	73-
1971	912,141	789,018	87	53,593	6	735,425-	81-
1972	1,100,595	816,673	74	36,931	3	779,742-	71-
1973	1,052,853	918,927	87	43,468	4	875,459-	83-
1974	1,108,320	1,020,486	92	107,689	10	912,797-	82-
1975	728,522	759,495	104	47,778	7	711,717-	98-
1976	1,173,359	1,262,042	108	74,488	6	1,187,554-	101-
1977	974,349	1,186,335	122	78,671	8	1,107,664-	114-
1978	1,022,174	1,295,173	127	63,086	6	1,232,087-	121-
1979	1,146,108	1,465,458	128	65,254	6	1,400,204-	122-
1980	1,103,244	1,590,371	144	71,407	6	1,518,964-	138-
1981	1,266,931	1,856,917	147	111,500	9	1,745,417-	138-
1982	1,174,933	2,032,289	173	84,508	7	1,947,781-	166-
1983	1,222,776	2,374,547	194	74,218	6	2,300,329-	188-
1984	1,076,376	2,820,630	262	100,098	9	2,720,532-	253-
1985	1,574,569	3,144,514	200	93,190	6	3,051,324-	194-
1986	1,619,844	3,180,905	196	132,878	8	3,048,027-	188-
1987	1,345,097	3,130,048	233	111,057	8	3,018,991-	224-
1988	1,680,598	2,680,825	160	237,701	14	2,443,124-	145-
1989	1,850,626	2,883,149	156	232,933	13	2,650,216-	143-
1990	1,578,153	2,832,494	179	423,618	27	2,408,876-	153-
1991	1,647,905	2,864,466	174	150,830	9	2,713,636-	165-
1992	1,811,840	2,757,672	152	311,615	17	2,446,057-	135-
1993	1,816,878	2,995,513	165	148,532	8	2,846,981-	157-
1994	2,812,373	3,250,095	116	178,691	6	3,071,404-	109-
1995	1,561,994	3,819,129	245	94,217	6	3,724,912-	238-
1996	2,502,125	3,120,885	125	113,989	5	3,006,896-	120-
1997	2,307,518	3,317,125	144	88,814	4	3,228,311-	140-
1998	1,253,244	2,786,515	222	265,510-	21-	3,052,025-	244-
1999	2,183,536	3,210,105	147	60,419	3	3,149,686-	144-
2000	1,232,534	2,960,357	240	184,339	15	2,776,018-	225-
TOTAL	54,504,995	77,128,421	142	4,080,831	7	73,047,590-	134-

Schedule 2-1

AMERENUE

ACCOUNT 364 POLES & FIXTURES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL AMOUNT	PCT	GROSS SALVAGE AMOUNT	PCT	NET SALVAGE AMOUNT	PCT
THREE-YEAR MOVING AVERAGES							
61-63	968,688	865,654	89	118,025	12	747,629-	77-
62-64	1,039,221	876,134	84	148,877	14	727,257-	70-
63-65	997,224	856,488	86	74,950	8	781,538-	78-
64-66	1,102,300	849,417	77	65,006	6	784,411-	71-
65-67	1,206,012	823,269	68	63,543	5	759,726-	63-
66-68	1,281,981	812,163	63	63,896	5	748,267-	58-
67-69	1,214,185	745,468	61	62,600	5	682,868-	56-
68-70	1,031,087	691,567	67	47,675	5	643,892-	62-
69-71	953,941	712,712	75	49,950	5	662,762-	69-
70-72	940,232	743,447	79	41,486	4	701,961-	75-
71-73	1,021,863	841,539	82	44,664	4	796,875-	78-
72-74	1,087,256	918,695	84	62,696	6	855,999-	79-
73-75	963,232	899,636	93	66,312	7	833,324-	87-
74-76	1,003,400	1,014,008	101	76,652	8	937,356-	93-
75-77	958,743	1,069,291	112	66,979	7	1,002,312-	105-
76-78	1,056,627	1,247,850	118	72,082	7	1,175,768-	111-
77-79	1,047,544	1,315,655	126	69,004	7	1,246,651-	119-
78-80	1,090,509	1,450,334	133	66,582	6	1,383,752-	127-
79-81	1,172,094	1,637,582	140	82,720	7	1,554,862-	133-
80-82	1,181,703	1,826,526	155	89,138	8	1,737,388-	147-
81-83	1,221,547	2,087,918	171	90,075	7	1,997,843-	164-
82-84	1,158,028	2,409,155	208	86,275	7	2,322,880-	201-
83-85	1,291,240	2,779,897	215	89,169	7	2,690,728-	208-
84-86	1,423,596	3,048,683	214	108,722	8	2,939,961-	207-
85-87	1,513,170	3,151,822	208	112,375	7	3,039,447-	201-
86-88	1,548,513	2,997,259	194	160,545	10	2,836,714-	183-
87-89	1,625,440	2,898,007	178	193,897	12	2,704,110-	166-
88-90	1,703,126	2,798,823	164	298,084	18	2,500,739-	147-
89-91	1,692,228	2,860,036	169	269,127	16	2,590,909-	153-
90-92	1,679,299	2,818,211	168	295,354	18	2,522,857-	150-
91-93	1,758,874	2,872,550	163	203,659	12	2,668,891-	152-
92-94	2,147,030	3,001,093	140	212,946	10	2,788,147-	130-
93-95	2,063,748	3,354,912	163	140,480	7	3,214,432-	156-
94-96	2,292,164	3,396,703	148	128,966	6	3,267,737-	143-
95-97	2,123,879	3,419,046	161	99,007	5	3,320,039-	156-
96-98	2,020,962	3,074,842	152	20,902-	1-	3,095,744-	153-
97-99	1,914,766	3,104,582	162	38,759-	2-	3,143,341-	164-
98-00	1,556,438	2,985,659	192	6,917-	0	2,992,576-	192-
FIVE-YEAR AVERAGE							
96-00	1,895,791	3,078,997	162	36,410	2	3,042,587-	160-

AMERENUE

ACCOUNT 365 OVERHEAD CONDUCTORS & DEVICES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL AMOUNT	PCT	GROSS SALVAGE AMOUNT	PCT	NET SALVAGE AMOUNT	PCT
1961	1,040,265	425,810	41	505,986	49	80,176	8
1962	952,815	444,877	47	178,995	19	265,882-	28-
1963	1,097,170	465,276	42	466,920	43	1,644	0
1964	1,282,942	503,182	39	547,499	43	44,317	3
1965	1,212,839	453,357	37	561,446	46	108,089	9
1966	1,579,773	570,369	36	742,067	47	171,698	11
1967	1,974,820	637,461	32	579,655	29	57,806-	3-
1968	1,736,620	867,329	50	509,499	29	357,830-	21-
1969	2,079,930	947,577	46	713,604	34	233,973-	11-
1970	1,468,855	746,727	51	643,051	44	103,676-	7-
1971	1,587,389	877,126	55	528,095	33	349,031-	22-
1972	1,826,079	980,969	54	536,784	29	444,185-	24-
1973	1,860,795	1,271,662	68	892,142	48	379,520-	20-
1974	1,715,496	1,018,354	59	1,077,458	63	59,104	3
1975	1,335,178	577,950	43	482,773	36	95,177-	7-
1976	2,052,556	1,032,383	50	1,015,830	49	16,553-	1-
1977	1,718,798	1,038,859	60	870,863	51	167,996-	10-
1978	1,800,154	1,226,634	68	1,068,831	59	157,803-	9-
1979	1,922,449	1,376,606	72	1,087,355	57	289,251-	15-
1980	1,882,592	1,470,392	78	767,037	41	703,355-	37-
1981	2,383,759	1,883,109	79	714,789	30	1,168,320-	49-
1982	2,318,697	1,963,422	85	1,162,538	50	800,884-	35-
1983	2,166,463	2,074,041	96	759,426	35	1,314,615-	61-
1984	2,135,016	2,487,871	117	671,620	31	1,816,251-	85-
1985	3,361,412	3,015,407	90	842,068	25	2,173,339-	65-
1986	4,495,526	3,581,801	80	979,330	22	2,602,471-	58-
1987	3,717,159	3,127,851	84	710,646	19	2,417,205-	65-
1988	3,107,802	3,354,214	108	1,746,310	56	1,607,904-	52-
1989	5,026,838	3,607,175	72	1,740,519	35	1,866,656-	37-
1990	3,426,194	3,329,081	97	1,433,618	42	1,895,463-	55-
1991	3,277,086	3,498,431	107	1,089,023	33	2,409,408-	74-
1992	3,047,877	3,200,203	105	1,633,445	54	1,566,758-	51-
1993	2,645,352	3,388,080	128	1,007,187	38	2,380,893-	90-
1994	3,158,468	3,608,627	114	1,363,430	43	2,245,197-	71-
1995	2,441,128	3,585,697	147	856,980	35	2,728,717-	112-
1996	3,946,269	2,935,587	74	573,649	15	2,361,938-	60-
1997	4,026,043	3,262,209	81	472,145	12	2,790,064-	69-
1998	2,922,526	2,709,062	93	426,607	15	2,282,455-	78-
1999	3,017,572	3,220,444	107	504,326	17	2,716,118-	90-
2000	2,565,236	2,980,105	116	432,570	17	2,547,535-	99-
TOTAL	95,313,938	77,745,317	82	32,896,116	35	44,849,201-	47-

AMERENUE

ACCOUNT 365 OVERHEAD CONDUCTORS & DEVICES

SUMMARY OF BOOK SALVAGE

YEAR	REGULAR RETIREMENTS	COST OF REMOVAL AMOUNT	PCT	GROSS SALVAGE AMOUNT	PCT	NET SALVAGE AMOUNT	PCT
THREE-YEAR MOVING AVERAGES							
61-63	1,030,083	445,321	43	383,967	37	61,354-	6-
62-64	1,110,976	471,112	42	397,805	36	73,307-	7-
63-65	1,197,650	473,938	40	525,288	44	51,350	4
64-66	1,358,518	508,969	37	617,004	45	108,035	8
65-67	1,589,144	553,729	35	627,723	40	73,994	5
66-68	1,763,738	691,720	39	610,407	35	81,313-	5-
67-69	1,930,457	817,456	42	600,919	31	216,537-	11-
68-70	1,761,802	853,878	48	622,051	35	231,827-	13-
69-71	1,712,058	857,143	50	628,250	37	228,893-	13-
70-72	1,627,441	868,274	53	569,310	35	298,964-	18-
71-73	1,758,088	1,043,252	59	652,340	37	390,912-	22-
72-74	1,800,790	1,090,328	61	835,461	46	254,867-	14-
73-75	1,637,156	955,989	58	817,458	50	138,531-	8-
74-76	1,701,077	876,229	52	858,687	50	17,542-	1-
75-77	1,702,177	883,064	52	789,822	46	93,242-	5-
76-78	1,857,169	1,099,292	59	985,175	53	114,117-	6-
77-79	1,813,800	1,214,033	67	1,009,016	56	205,017-	11-
78-80	1,868,398	1,357,877	73	974,408	52	383,469-	21-
79-81	2,062,933	1,576,702	76	856,394	42	720,308-	35-
80-82	2,195,016	1,772,308	81	881,455	40	890,853-	41-
81-83	2,289,640	1,973,524	86	878,918	38	1,094,606-	48-
82-84	2,206,725	2,175,111	99	864,528	39	1,310,583-	59-
83-85	2,554,297	2,525,773	99	757,705	30	1,768,068-	69-
84-86	3,330,651	3,028,360	91	831,006	25	2,197,354-	66-
85-87	3,858,032	3,241,686	84	844,015	22	2,397,671-	62-
86-88	3,773,496	3,354,622	89	1,145,429	30	2,209,193-	59-
87-89	3,950,600	3,363,080	85	1,399,158	35	1,963,922-	50-
88-90	3,853,611	3,430,157	89	1,640,149	43	1,790,008-	46-
89-91	3,910,039	3,478,229	89	1,421,053	36	2,057,176-	53-
90-92	3,250,386	3,342,572	103	1,385,362	43	1,957,210-	60-
91-93	2,990,105	3,362,238	112	1,243,218	42	2,119,020-	71-
92-94	2,950,566	3,398,970	115	1,334,687	45	2,064,283-	70-
93-95	2,748,316	3,527,468	128	1,075,866	39	2,451,602-	89-
94-96	3,181,955	3,376,637	106	931,353	29	2,445,284-	77-
95-97	3,471,147	3,261,164	94	634,258	18	2,626,906-	76-
96-98	3,631,613	2,968,953	82	490,800	14	2,478,153-	68-
97-99	3,322,047	3,063,905	92	467,693	14	2,596,212-	78-
98-00	2,835,111	2,969,870	105	454,501	16	2,515,369-	89-
FIVE-YEAR AVERAGE							
96-00	3,295,529	3,021,481	92	481,859	15	2,539,622-	77-

Schedule 3-2

AmerenUE

Comparison of Future Estimated Net Salvage Costs and Net Salvage Accrual
During the Period 2001 Through 2094 for Account 365, Overhead Conductors & Devices

Year	Retirements	Ending Balance	Estimated Net Salvage Costs	Cumulative Est. Net Salvage	Net Salvage Accrual	Cumulative Net Salvage Accrual
Previous Theoretical Net Salvage Activity						(67,746,212)
2001	5,983,584.56	577,082,237.44	(2,991,792)	(2,991,792)	(6,139,173)	(73,885,385)
2002	6,109,003.71	570,973,233.73	(3,054,502)	(6,046,294)	(6,074,183)	(79,959,568)
2003	6,234,507.42	564,738,726.31	(3,117,254)	(9,163,548)	(6,007,859)	(85,967,427)
2004	6,360,111.85	558,378,614.46	(3,180,056)	(12,343,604)	(5,940,198)	(91,907,625)
2005	6,485,792.19	551,892,822.27	(3,242,896)	(15,586,500)	(5,871,200)	(97,778,825)
2006	6,611,481.04	545,281,341.23	(3,305,741)	(18,892,241)	(5,800,865)	(103,579,690)
2007	6,737,165.03	538,544,176.20	(3,368,583)	(22,260,824)	(5,729,193)	(109,308,883)
2008	6,862,966.55	531,681,209.65	(3,431,483)	(25,692,307)	(5,656,183)	(114,965,066)
2009	6,988,733.63	524,692,476.02	(3,494,367)	(29,186,674)	(5,581,835)	(120,546,901)
2010	7,114,469.15	517,578,006.87	(3,557,235)	(32,743,909)	(5,506,149)	(126,053,050)
2011	7,240,222.46	510,337,784.41	(3,620,111)	(36,364,020)	(5,429,125)	(131,482,175)
2012	7,366,018.54	502,971,765.87	(3,683,009)	(40,047,029)	(5,350,763)	(136,832,938)
2013	7,491,845.68	495,479,920.19	(3,745,923)	(43,792,952)	(5,271,063)	(142,104,001)
2014	7,617,592.49	487,862,327.70	(3,808,796)	(47,601,748)	(5,190,025)	(147,294,026)
2015	7,743,158.16	480,119,169.54	(3,871,579)	(51,473,327)	(5,107,651)	(152,401,677)
2016	7,868,407.09	472,250,762.45	(3,934,204)	(55,407,531)	(5,023,944)	(157,425,621)
2017	7,992,910.88	464,257,851.57	(3,996,455)	(59,403,986)	(4,938,913)	(162,364,534)
2018	8,116,426.92	456,141,424.65	(4,058,213)	(63,462,199)	(4,852,568)	(167,217,102)
2019	8,238,615.60	447,902,809.05	(4,119,308)	(67,581,507)	(4,764,924)	(171,982,026)
2020	8,359,101.08	439,543,707.97	(4,179,551)	(71,761,058)	(4,675,997)	(176,658,023)
2021	8,477,372.72	431,066,335.25	(4,238,686)	(75,999,744)	(4,585,812)	(181,243,835)
2022	8,592,788.14	422,473,547.11	(4,296,394)	(80,296,138)	(4,494,399)	(185,738,234)
2023	8,704,983.62	413,768,563.49	(4,352,492)	(84,648,630)	(4,401,793)	(190,140,027)
2024	8,813,497.59	404,955,065.90	(4,406,749)	(89,055,379)	(4,308,033)	(194,448,060)
2025	8,917,588.83	396,037,477.07	(4,458,794)	(93,514,173)	(4,213,165)	(198,661,225)
2026	9,016,946.88	387,020,530.19	(4,508,473)	(98,022,646)	(4,117,240)	(202,778,465)
2027	9,110,955.47	377,909,574.72	(4,555,478)	(102,578,124)	(4,020,315)	(206,798,780)
2028	9,198,952.80	368,710,621.92	(4,599,476)	(107,177,600)	(3,922,453)	(210,721,233)
2029	9,280,378.77	359,430,243.15	(4,640,189)	(111,817,789)	(3,823,726)	(214,544,959)
2030	9,354,609.25	350,075,633.90	(4,677,305)	(116,495,094)	(3,724,209)	(218,269,168)
2031	9,421,187.58	340,654,446.32	(4,710,594)	(121,205,688)	(3,623,983)	(221,893,151)
2032	9,479,811.79	331,174,634.53	(4,739,906)	(125,945,594)	(3,523,134)	(225,416,285)
2033	9,529,892.45	321,644,742.08	(4,764,946)	(130,710,540)	(3,421,753)	(228,838,038)
2034	9,570,956.97	312,073,785.11	(4,785,478)	(135,496,018)	(3,319,934)	(232,157,972)
2035	9,602,653.10	302,471,132.01	(4,801,327)	(140,297,345)	(3,217,778)	(235,375,750)
2036	9,624,789.10	292,846,342.91	(4,812,395)	(145,109,740)	(3,115,387)	(238,491,137)
2037	9,636,855.23	283,209,487.68	(4,818,428)	(149,928,168)	(3,012,867)	(241,504,004)
2038	9,638,204.28	273,571,283.40	(4,819,102)	(154,747,270)	(2,910,333)	(244,414,337)
2039	9,628,462.28	263,942,821.12	(4,814,231)	(159,561,501)	(2,807,902)	(247,222,239)

SCHEDULE 6-1

AmerenUE

Comparison of Future Estimated Net Salvage Costs and Net Salvage Accrual
During the Period 2001 Through 2094 for Account 365, Overhead Conductors & Devices

Year	Retirements	Ending Balance	Estimated Net Salvage Costs	Cumulative Est. Net Salvage	Net Salvage Accrual	Cumulative Net Salvage Accrual
2040	9,607,233.25	254,335,587.87	(4,803,617)	(164,365,118)	(2,705,698)	(249,927,937)
2041	9,574,124.45	244,761,463.42	(4,787,062)	(169,152,180)	(2,603,845)	(252,531,782)
2042	9,529,219.15	235,232,244.27	(4,764,610)	(173,916,790)	(2,502,471)	(255,034,253)
2043	9,472,831.92	225,759,412.35	(4,736,416)	(178,653,206)	(2,401,696)	(257,435,949)
2044	9,405,072.91	216,354,339.44	(4,702,536)	(183,355,742)	(2,301,642)	(259,737,591)
2045	9,325,697.89	207,028,641.55	(4,662,849)	(188,018,591)	(2,202,432)	(261,940,023)
2046	9,234,663.60	197,793,977.95	(4,617,332)	(192,635,923)	(2,104,191)	(264,044,214)
2047	9,131,555.27	188,662,422.68	(4,565,778)	(197,201,701)	(2,007,047)	(266,051,261)
2048	9,016,052.70	179,646,369.98	(4,508,026)	(201,709,727)	(1,911,132)	(267,962,393)
2049	8,888,326.89	170,758,043.09	(4,444,163)	(206,153,890)	(1,816,575)	(269,778,968)
2050	8,749,194.60	162,008,848.49	(4,374,597)	(210,528,487)	(1,723,498)	(271,502,466)
2051	8,599,226.45	153,409,622.04	(4,299,613)	(214,828,100)	(1,632,017)	(273,134,483)
2052	8,438,246.00	144,971,376.04	(4,219,123)	(219,047,223)	(1,542,249)	(274,676,732)
2053	8,266,133.12	136,705,242.92	(4,133,067)	(223,180,290)	(1,454,311)	(276,131,043)
2054	8,083,123.81	128,622,119.11	(4,041,562)	(227,221,852)	(1,368,320)	(277,499,363)
2055	7,889,355.73	120,732,763.38	(3,944,678)	(231,166,530)	(1,284,391)	(278,783,754)
2056	7,685,006.62	113,047,756.76	(3,842,503)	(235,009,033)	(1,202,636)	(279,986,390)
2057	7,470,226.49	105,577,530.27	(3,735,113)	(238,744,146)	(1,123,165)	(281,109,555)
2058	7,245,034.97	98,332,495.30	(3,622,517)	(242,366,663)	(1,046,090)	(282,155,645)
2059	7,009,873.07	91,322,522.23	(3,504,937)	(245,871,600)	(971,517)	(283,127,162)
2060	6,766,007.77	84,556,614.46	(3,383,004)	(249,254,604)	(899,538)	(284,026,700)
2061	6,514,745.30	78,041,869.16	(3,257,373)	(252,511,977)	(830,233)	(284,856,933)
2062	6,256,423.82	71,785,445.34	(3,128,212)	(255,640,189)	(763,675)	(285,620,608)
2063	5,991,382.43	65,794,062.91	(2,995,691)	(258,635,880)	(699,937)	(286,320,545)
2064	5,720,825.49	60,073,237.42	(2,860,413)	(261,496,293)	(639,077)	(286,959,622)
2065	5,445,307.17	54,627,930.25	(2,722,654)	(264,218,947)	(581,148)	(287,540,770)
2066	5,165,611.62	49,462,318.63	(2,582,806)	(266,801,753)	(526,195)	(288,066,965)
2067	4,882,759.04	44,579,559.59	(2,441,380)	(269,243,133)	(474,251)	(288,541,216)
2068	4,597,996.62	39,981,562.97	(2,298,998)	(271,542,131)	(425,336)	(288,966,552)
2069	4,312,891.48	35,668,671.49	(2,156,446)	(273,698,577)	(379,454)	(289,346,006)
2070	4,027,635.71	31,641,035.78	(2,013,818)	(275,712,395)	(336,607)	(289,682,613)
2071	3,742,982.46	27,898,053.32	(1,871,491)	(277,583,886)	(296,788)	(289,979,401)
2072	3,460,711.43	24,437,341.89	(1,730,356)	(279,314,242)	(259,972)	(290,239,373)
2073	3,181,947.11	21,255,394.78	(1,590,974)	(280,905,216)	(226,121)	(290,465,494)
2074	2,908,203.02	18,347,191.76	(1,454,102)	(282,359,318)	(195,183)	(290,660,677)
2075	2,641,349.42	15,705,842.34	(1,320,675)	(283,679,993)	(167,083)	(290,827,760)
2076	2,382,731.91	13,323,110.43	(1,191,366)	(284,871,359)	(141,735)	(290,969,495)
2077	2,133,638.71	11,189,471.72	(1,066,819)	(285,938,178)	(119,037)	(291,088,532)
2078	1,894,649.24	9,294,822.48	(947,325)	(286,885,503)	(98,881)	(291,187,413)
2079	1,666,304.82	7,628,517.66	(833,152)	(287,718,655)	(81,154)	(291,268,567)

SCHEDULE 6-2

AmerenUE

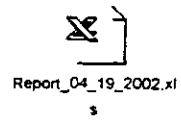
Comparison of Future Estimated Net Salvage Costs and Net Salvage Accrual
During the Period 2001 Through 2094 for Account 365, Overhead Conductors & Devices

Year	Retirements	Ending Balance	Estimated Net Salvage Costs	Cumulative Est. Net Salvage	Net Salvage Accrual	Cumulative Net Salvage Accrual
2080	1,450,135.87	6,178,381.79	(725,068)	(288,443,723)	(65,727)	(291,334,294)
2081	1,247,911.48	4,930,470.31	(623,956)	(289,067,679)	(52,452)	(291,386,746)
2082	1,060,632.23	3,869,838.08	(530,316)	(289,597,995)	(41,168)	(291,427,914)
2083	889,839.15	2,979,998.93	(444,920)	(290,042,915)	(31,702)	(291,459,616)
2084	737,258.43	2,242,740.50	(368,629)	(290,411,544)	(23,859)	(291,483,475)
2085	601,584.09	1,641,156.41	(300,792)	(290,712,336)	(17,459)	(291,500,934)
2086	480,449.89	1,160,706.52	(240,225)	(290,952,561)	(12,348)	(291,513,282)
2087	374,468.44	786,238.08	(187,234)	(291,139,795)	(8,364)	(291,521,646)
2088	283,762.12	502,475.96	(141,881)	(291,281,676)	(5,345)	(291,526,991)
2089	205,588.45	296,887.51	(102,794)	(291,384,470)	(3,158)	(291,530,149)
2090	139,146.72	157,740.79	(69,573)	(291,454,043)	(1,678)	(291,531,827)
2091	85,716.04	72,024.75	(42,858)	(291,496,901)	(766)	(291,532,593)
2092	46,734.03	25,290.72	(23,367)	(291,520,268)	(269)	(291,532,862)
2093	20,470.43	4,820.29	(10,235)	(291,530,503)	(51)	(291,532,913)
2094	4,820.29	0	(2,410)	(291,532,913)	0	(291,532,913)

SCHEDULE 6-3

Opich, Thomas G

From: Kenney, Robert J
Sent: Friday, April 19, 2002 3:29 PM
To: Opich, Thomas G
Subject: FW: AmerenUE - Depreciation - Tables A, B, & C



-----Original Message-----
From: Wiedmayer, John F., Jr. [mailto:jwiedmayer@GFNET.com]
Sent: Friday, April 19, 2002 3:17 PM
To: Robert J. Kenney (E-mail)
Cc: Gary Weiss (E-mail); Stout, William M.
Subject: AmerenUE - Depreciation - Tables A, B, & C

Bob,

Attached are the revised depreciation schedules. Tables A, B & C supersede those that were included in our bound depreciation study report that you submitted to the Missouri PSC in 2/2002. The Tables reflect revisions to several terminal dates at four electricity generating stations. The changes include:

1. Venice Power Plant (Accts 311 - 316) - Probable Retirement Date revised from 06/2010 to 06/2004. Also the net salvage percent was revised from -60% to -52%.

2. Osage Hydro Plant - (Accts 331 - 336) - Probable Retirement Date revised from 02/2031 to 02/2036. Also the Interim Survivor Curve for Account 331 was revised from a 160-R1 to a 160-R1.5. In addition, there was ~$1.3M incorrectly coded as vintage year 2000. The amount was changed to vintage year 1931.

3. Keokuk Hydro Plant - (Accts. 331 - 336) - Probable Retirement Date changed from 06/2013 to 06/2028.

4. Taum Sauk Pumped Storage Plant - (Accts 331 - 336) Probable Retirement Date changed from 07/2010 to 07/2040.

Please call me if you wish to discuss the matter further.

<<Report_04_19_2002.xls>>

John Wiedmayer
Mailing Address
P.O. Box 80794
Valley Forge, PA 19484-0784
Physical Address
Valley Forge Corporate Center, 1010 Adams Avenue
Audubon, PA 19403-2402
Tel: (610) 650-8101, x 242
Fax: (610) 650-8190

Schedule 5

451