Exhibit No.: Issue: Witness: Type of Exhibit: Sponsoring Party: Case No.: Date Testimony Prepared:

Rates Maurice Brubaker Direct Testimony Noranda Aluminum, Inc. EC-2014-____ February 7, 2014

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service

Case No. EC-2014-____

Direct Testimony and Schedules of

Maurice Brubaker

On behalf of

Noranda Aluminum, Inc.

February 7, 2014



Project 9851

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Noranda Aluminum, Inc.'s **Request for Revisions to Union Electric** Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service

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Case No. EC-2014-

STATE OF MISSOURI

COUNTY OF ST. LOUIS

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Affidavit of Maurice Brubaker

Maurice Brubaker, being first duly sworn, on his oath states:

1. My name is Maurice Brubaker. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Noranda Aluminum, Inc. in this proceeding on its behal f.

2. Attached hereto and made a part hereof for all purposes are my direct testimony and schedules which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. EC-2014-

3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

- Buchste

Subscribed and sworn to before me this 6th day of February, 2014.

TAMMY S. KLOSSNER Notary Public - Notary Seal STATE OF MISSOURI St. Charles County My Commission Expires: Mar. 14, 2015 Commission # 11024862

Notary Public

BRUBAKER & ASSOCIATES, INC.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service

Case No. EC-2014-____

Direct Testimony of Maurice Brubaker

1 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

- 2 A Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,
- 3 Chesterfield, MO 63017.

4 Q WHAT IS YOUR OCCUPATION?

- 5 A I am a consultant in the field of public utility regulation and President of Brubaker &
- 6 Associates, Inc., energy, economic and regulatory consultants.

7 Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

8 A This information is included in Appendix A to this testimony.

9 Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

10 A This testimony is presented on behalf of Noranda Aluminum, Inc. ("Noranda").

1 Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?

2 А Mr. Kip Smith has explained the economic conditions in the aluminum industry and 3 detailed how they are affecting Noranda's aluminum smelter at New Madrid. As part 4 of his testimony, he has identified the challenges facing Noranda and is requesting 5 the Commission to approve an adjustment in the rate paid by Noranda and to 6 approve a long-term rate plan. The purpose of my testimony is to quantify the 7 revenue consequences of that rate request and to explain how rates could be 8 adjusted to compensate for that request on a basis that is revenue-neutral to Ameren 9 Missouri.

10 Q WHAT IS THE RATE SCHEDULE UNDER WHICH NORANDA CURRENTLY 11 TAKES SERVICE?

12 A Noranda currently takes service under Service Classification No. 12(M) ("SC
13 No. 12(M)"), the Large Transmission Service rate.

14 Q WHAT IS THE AVERAGE COST PER KILOWATT-HOUR ("KWH") TO NORANDA

15 UNDER SC NO. 12(M)?

A Under the final rates approved in Ameren Missouri's most recent rate case (Case No.
 ER-2012-0166) and Noranda's test year volumes, the average base rate revenue
 paid to Ameren Missouri is \$37.94 per megawatt-hour ("MWh"), or 3.794¢ per kWh.
 This is the composite effect of the customer charge, demand charge, energy charge
 and other charges in the tariff. Test year base rate revenues were approximately

\$158 million. The current Fuel Adjustment Charge ("FAC") of \$3.50 per MWh brings
 the total Ameren Missouri cost to \$41.44/MWh on a test year basis.¹

3 Q HAVE YOU DEVELOPED A SAMPLE TARIFF TO EFFECTUATE NORANDA'S 4 RATE REQUEST?

5 A Yes. Schedule MEB-1 is the illustrative (EXEMPLAR) tariff I am proposing for this 6 purpose. In order to allow the existing SC No. 12(M) to remain available to other 7 customers (Noranda is currently the only customer) I have left SC No. 12(M) 8 unchanged and created Service Classification No. 10(M) ("SC No. 10(M)"), described 9 as "Large Transmission Service Rate Applicable to Aluminum Smelters."

10 The energy charge is the \$30 per MWh (3.0¢ per kWh) rate supported by Mr.
11 Smith.

12 The other provision in the pricing section of the tariff recognizes the 13 low-income pilot program that is being conducted. Noranda currently pays \$1,500 14 per month toward this pilot program and that charge would continue. In addition, 15 provision has been made to allow that number to grow in the event that the program 16 is expanded. The not-to-exceed amount under this provision is stated as the current 17 \$1,500 per month plus 100 times the monthly low-income program charge paid by a 18 residential customer consuming 1,500 kWh of energy per month.

19 Other provisions of the tariff have been adjusted in order to implement the 20 requested rate treatment, including maintaining the terms and conditions over the 21 10-year period.

¹Based on test year usage, current base rates and current FAC, and the approximately \$1.50/MWh paid to Associated Electric Cooperative to wheel power to the smelter, the "all-in" cost is \$42.94/MWh. Based on forecasted usage and a lower FAC, Mr. Smith estimates the all-in cost to be \$41/MWh in 2014, and \$41.50/MWh in 2015.

1QHAVE YOU CALCULATED THE DOLLAR REDUCTION IN BASE RATE2REVENUES THAT WOULD BE ASSOCIATED WITH IMPLEMENTATION OF3NORANDA'S RATE REQUEST?

4 A Yes. This calculation is summarized on Schedule MEB-2.

5 Q PLEASE EXPLAIN THIS SCHEDULE.

A The average rate per kWh paid by Noranda under SC No. 12(M) that was approved
in Case No. ER-2012-0166, at Noranda's test year kWh consumption, is 3.794¢ per
kWh as shown on line 1. Comparing that to the requested 3¢ per kWh rate indicates
a difference of 0.794¢ per kWh, as shown on line 3. Line 4 shows Noranda's test
year kWh and line 5 shows the \$33.1 million base rate adjustment which is
determined by multiplying the figure on line 3 times the kWh shown on line 4.

12 Q DO YOU HAVE A RECOMMENDATION FOR HOW TO ADJUST BASE RATES OF

13

3 OTHER CUSTOMER CLASSES TO IMPLEMENT THIS RATE ADJUSTMENT?

A Yes. I believe that the most reasonable way would be by means of an equal
 percentage increase applied to the test year base rate revenues of the other major
 customer classes. This approach treats all classes the same way and maintains the
 interclass revenue relationships established in the Final Order in Case No.
 ER-2012-0166.

19 Q HAVE YOU PERFORMED THIS CALCULATION?

A Yes. It appears on Schedule MEB-3. Column 1 shows the test year base rate
 revenues of each class and Column 2 shows the adjustment. The adjustment is
 developed by multiplying the test year base rate revenues in Column 1 times

1.2514%. This is the amount necessary to recover the \$33.1 million base rate
 revenue decrease associated with Noranda's rate request.

Q DOES NORANDA CURRENTLY PAY ANY OTHER CHARGES THAT IT WOULD
 4 NOT PAY UNDER ITS RATE REQUEST?

5 Yes. Noranda also pays an FAC which, as previously noted, currently is 0.350¢ per А 6 kWh. That amount will likely change between now and the time that the rate 7 adjustment is implemented. However, whatever FAC revenue reduction occurs when the rate adjustment is implemented will be picked up automatically through the 8 9 operation of the FAC. (At current rates, FAC payments by Noranda amount to 10 approximately \$14.6 million per year.) At the level of the current FAC, the 11 combination of the reduction in base revenues and in FAC revenues is approximately 12 \$47.7 million per year.²

13 Q ARE RATES THAT ARE DESIGNED TO RETAIN AT-RISK LOADS TYPICALLY

14 PRICED BELOW FULL EMBEDDED COST OF SERVICE?

- 15 A Yes. The concept behind a load retention rate is to retain on the system a load that16 otherwise might not be served.
- 17 The basis for such a rate is typically a price above variable cost so that some
- 18 contribution to fixed costs is provided.

²If the FAC remains at its current level, the average revenue change to the other major rate classes, considering both base rates and the FAC, would be 1.80%.

1 Q WHAT IS THE AVERAGE VARIABLE COST ASSOCIATED WITH PROVIDING 2 SERVICE TO NORANDA?

A Based on the final rates adopted in Case No. ER-2012-0166 the average variable
 cost included in base rates (net base energy costs) is approximately 1.469¢ per kWh.
 The cost currently is approximately 1.82¢ per kWh because of the existence of a
 positive FAC factor.³

Because the 3.0¢ per kWh price to be paid by Noranda is in excess of
average variable cost it provides a positive contribution and offset to fixed costs and
provides a benefit to other customers.

10 Q HAVE YOU CALCULATED WHAT THE NET REVENUE LOSS WOULD BE IF 11 NORANDA WERE NOT OPERATING THE SMELTER?

12 A Yes. Based on the estimated reduction in Ameren Missouri's Actual Net Energy 13 Costs ("ANEC") provided to me by my colleague Mr. Dauphinais, I have calculated 14 that the net revenue loss if the smelter were not served would be approximately \$60 15 million⁴ per year.

16 Q HOW DOES THIS AMOUNT COMPARE TO THE REDUCTION IN REVENUES

17 UNDER THE REQUESTED RATE PLAN WHEREIN THE SMELTER CONTINUES

18 AS A RETAIL CUSTOMER OF AMEREN MISSOURI BUT AT A RATE LOWER

19 THAN WHAT IT CURRENTLY PAYS?

A In the scenario where the smelter remains as a retail customer of Ameren Missouri
but at a lower rate, the calculated revenue reduction was \$33.1 million in base

 $^{^{3}1.469}$ ¢ + 0.35¢ = 1.819¢

 $^{^{4}}$ (\$0.03794 + \$0.0035 - \$0.02705) (4,168,922,201) = \$59,990,790. The impact on the other major customer classes to hold Ameren Missouri harmless would be 2.27%.

revenues and \$14.6 million in FAC, for a total of \$47.7 million, or 1.80%. Because
this amount is smaller than the \$60 million (2.27%) net revenue loss that would be
incurred were the smelter not to operate, the requested rate plan also is reasonable
when evaluated on this basis.

5 Q HAVE YOU PREPARED TARIFF SHEETS THAT SHOW HOW THE RATES 6 CHARGED TO CUSTOMERS IN OTHER CLASSES WOULD CHANGE IN ORDER 7 TO RECOVER THE ADDITIONAL REVENUES SHOWN ON SCHEDULE MEB-3?

8 A Yes. This is shown on the "EXEMPLAR" tariff sheets in Schedule MEB-4.

9 These rates were developed by increasing current charges (excluding charges 10 for the low-income pilot plan and for energy efficiency) for each rate schedule in order 11 to produce the additional revenues shown in Column (2) of Schedule MEB-3.

12 Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

13 A Yes.

Maurice Brubaker Page 7

Qualifications of Maurice Brubaker

1	Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.		
2	А	Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,		
3		Chesterfield, MO 63017.		
4	Q	PLEASE STATE YOUR OCCUPATION.		
5	А	I am a consultant in the field of public utility regulation and President of the firm of		
6		Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.		
7	Q	PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND		
8		EXPERIENCE.		
9	А	I was graduated from the University of Missouri in 1965, with a Bachelor's Degree in		
10		Electrical Engineering. Subsequent to graduation I was employed by the Utilities		
11		Section of the Engineering and Technology Division of Esso Research and		
12		Engineering Corporation of Morristown, New Jersey, a subsidiary of Standard Oil of		
13		New Jersey.		
14		In the Fall of 1965, I enrolled in the Graduate School of Business at		
15		Washington University in St. Louis, Missouri. I was graduated in June of 1967 with		
16		the Degree of Master of Business Administration. My major field was finance.		
17		From March of 1966 until March of 1970, I was employed by Emerson Electric		
18		Company in St. Louis. During this time I pursued the Degree of Master of Science in		
19		Engineering at Washington University, which I received in June, 1970.		
20		In March of 1970, I joined the firm of Drazen Associates, Inc., of St. Louis,		
21		Missouri. Since that time I have been engaged in the preparation of numerous		

1 studies relating to electric, gas, and water utilities. These studies have included analyses of the cost to serve various types of customers, the design of rates for utility 2 3 services, cost forecasts, cogeneration rates and determinations of rate base and 4 operating income. I have also addressed utility resource planning principles and 5 plans, reviewed capacity additions to determine whether or not they were used and 6 useful, addressed demand-side management issues independently and as part of 7 least cost planning, and have reviewed utility determinations of the need for capacity 8 additions and/or purchased power to determine the consistency of such plans with 9 least cost planning principles. I have also testified about the prudency of the actions 10 undertaken by utilities to meet the needs of their customers in the wholesale power 11 markets and have recommended disallowances of costs where such actions were 12 deemed imprudent.

I have testified before the Federal Energy Regulatory Commission ("FERC"),
various courts and legislatures, and the state regulatory commissions of Alabama,
Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia,
Guam, Hawaii, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Missouri,
Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania,
Rhode Island, South Carolina, South Dakota, Texas, Utah, Virginia, West Virginia,
Wisconsin and Wyoming.

The firm of Drazen-Brubaker & Associates, Inc. was incorporated in 1972 and assumed the utility rate and economic consulting activities of Drazen Associates, Inc., founded in 1937. In April, 1995 the firm of Brubaker & Associates, Inc. was formed. It includes most of the former DBA principals and staff. Our staff includes consultants with backgrounds in accounting, engineering, economics, mathematics, computer science and business.

> Maurice Brubaker Appendix A Page 2

Brubaker & Associates, Inc. and its predecessor firm has participated in over 700 major utility rate and other cases and statewide generic investigations before utility regulatory commissions in 40 states, involving electric, gas, water, and steam rates and other issues. Cases in which the firm has been involved have included more than 80 of the 100 largest electric utilities and over 30 gas distribution companies and pipelines.

7 An increasing portion of the firm's activities is concentrated in the areas of 8 competitive procurement. While the firm has always assisted its clients in negotiating 9 contracts for utility services in the regulated environment, increasingly there are 10 opportunities for certain customers to acquire power on a competitive basis from a 11 supplier other than its traditional electric utility. The firm assists clients in identifying 12 and evaluating purchased power options, conducts RFPs and negotiates with 13 suppliers for the acquisition and delivery of supplies. We have prepared option 14 studies and/or conducted RFPs for competitive acquisition of power supply for 15 industrial and other end-use customers throughout the Unites States and in Canada, 16 involving total needs in excess of 3,000 megawatts. The firm is also an associate member of the Electric Reliability Council of Texas and a licensed electricity 17 18 aggregator in the State of Texas.

In addition to our main office in St. Louis, the firm has branch offices in
Phoenix, Arizona and Corpus Christi, Texas.

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Maurice Brubaker Appendix A Page 3

BRUBAKER & ASSOCIATES, INC.

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO.

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO.

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 10(M)

LARGE TRANSMISSION SERVICE RATE APPLICABLE TO ALUMINUM SMELTERS

RATE BASED ON MONTHLY METER READINGS

<u>Energy Charge</u> All energy shall be billed at a rate of 3.0¢ per kWh. This rate is subject to increases only when the rates of other customers change as a result of a general rate proceeding, but the increase in any general rate proceeding shall not exceed 2% of the then-effective energy charge.

Low-Income Program Charge If Company is conducting a low-income program, customer will pay a monthly charge not-to-exceed \$1,500 plus 100 times the monthly amount paid by a residential customer using 1,500 kWh of energy per month.

Except as provided above, no other charges, or changes in charges, shall be applied to this rate for a period of ten (10) years from the initial date of service on this rate.

Schedule MEB-1 Page 1 of 4

DATE OF ISSUE

DATE EFFECTIVE

ISSUED BY

ELECTRIC SERVICE

EXEMPLAR Tariff

MO.P.S.C. SCHEDULE NO.

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO.

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 10(M)

LARGE TRANSMISSION SERVICE RATE APPLICABLE TO ALUMINUM SMELTERS (Cont'd.)

1. TRANSMISSION SERVICE REQUIREMENTS

Company's obligation to provide service under this rate is conditioned upon receipt of approval from the appropriate Regional Transmission Organization (RTO) to incorporate customer's load within Company's Network Integration Transmission Service agreement without the obligation or requirement that Company construct, upgrade, or improve any existing or new transmission plant or facilities.

Customer shall be responsible for securing firm transmission service throughout the Contract Term outside of Company's control area at no cost or charge to Company (except for Energy Line Losses), if necessary, and customer agrees to indemnify and hold Company harmless from all such costs or charges imposed or billed. In any event, customer shall be responsible for all costs and charges imposed or billed to Company from an RTO that are based on the fact that customer's load is not directly connected to Company's system (e.g. Through and Out rates imposed by the Midwest Independent System Operator, Inc.)

2. CREDIT REQUIREMENTS

A customer taking service under this rate shall agree to the following special credit terms and conditions, in addition to those that may be required pursuant to Company's rules, regulations, rates or tariffs. Company, upon request and in its sole discretion, may demand of customer a security deposit in the form of cash, letter of credit or surety bond, equal to two times (2x) the highest monthly utility bill from the prior 12-month period, upon the occurrence of any of the following:

- a. an assignment to customer or customer's parent of a long-term public debt rating by Moody's that falls below the rating of Baa3;
- b. an assignment to customer or customer's parent of a long-term public debt rating by Standard & Poor's that falls below the rating of BBB-;
- c. a significant change in ownership, as determined by Company, including but not limited to a change in ownership or possession of the assets of customer;
- d. the assessment of two (2) late payment charges within any 12 month rolling period; or
- e. customer makes an assignment for the benefit of creditors, or otherwise becomes bankrupt or insolvent (however evidenced), in which case Company may pursue other remedies available in law or equity, including a declaration that the agreement is in default.

Schedule MEB-1 Page 2 of 4

DATE OF ISSUE

DATE EFFECTIVE

ISSUED BY

EXEMPLAR Tariff

MO.P.S.C. SCHEDULE NO.

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO.

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 10(M) LARGE TRANSMISSION SERVICE RATE APPLICABLE TO ALUMINUM SMELTERS (Cont'd.)

3. PAYMENTS

Bills are due and payable within ten (10) days from date of bill and become delinquent after twenty-one (21) days from date of bill.

4. <u>CONTRACT TERM</u>

A customer taking service under this rate shall agree to an initial Contract Term of 10 years. The Contract Term shall be extended in one-year increments unless or until the contract is terminated at the end of the Contract Term or any annual extension thereof by a written notice of termination given by customer and received not later than two years prior to the date of termination. During the Contract Term, a customer taking service under this rate agrees that Company shall be the exclusive supplier of power and energy to customer's premises, and waives any right or entitlement by virtue of any law, including but not limited to Section 91.026 RSMo as it now exists or as amended from time to time, statute, rule, regulation, or tariff, to purchase, acquire or take delivery of power and energy from any other person or entity.

5. <u>TAX ADJUSTMENT</u>

Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

6. RATE APPLICATION

This rate shall be applicable, at customer's request, to any customer operating an aluminum smelter that 1) meets the Rate Application conditions of the Large Primary Service rate, 2) can demonstrate to Company's satisfaction that such energy was routinely consumed at a load factor of 95% or higher or that customer will, in the ordinary course of its operations, operate at a similar load factor, 3) if necessary, arranges and pays for transmission service for the delivery of electricity over the transmission facilities of a third party, 4) does not require use of Company's distribution system or distribution arrangements that are provided by Company at Company's cost, excepting Company's metering equipment, for service to customer, and 5) meets all other required terms and conditions of the rate.

7. <u>CHARACTER OF SERVICE SUPPLIED</u>

Company will supply a standard three-phase alternating current transmission service voltage. The appropriate adjustments under Rider C will apply; however, there will be no adjustments under Rider B.

Schedule MEB-1 Page 3 of 4

DATE OF ISSUE

DATE EFFECTIVE

EXEMPLAR Tariff

MO.P.S.C. SCHEDULE NO.

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO.

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 10(M) LARGE TRANSMISSION SERVICE RATE APPLICABLE TO ALUMINUM SMELTERS (Cont'd.)

8. <u>DEMAND METERS</u>

Company will be responsible for the demand meters which have been installed for the measurement of demands.

9. During a period of ten (10) years from the initial date of service under this rate no changes shall be made in the terms and conditions in Sections 1, 2, 3, 4, 5, 6, 7, and 8, and no new terms or conditions may be added.

10. GENERAL RULES AND REGULATIONS

In addition to the above specific rules and regulations, all of Company's General Rules and Regulations shall apply to the supply of service under this rate.

Schedule MEB-1 Page 4 of 4

DATE EFFECTIVE

ISSUED BY

Ameren Missouri

Base Rate Revenue Change Attributable to Noranda's Rate Request

Line	Description	Amount	
		(1)	
1	Revenue per kWh under SC 12(M) approved in Case No. ER-2012-0166 and Noranda's Test Year kWh Purchases	3.794¢	
2	Requested Rate	3.000¢	
3	Difference	0.794¢	
4	Noranda's Test Year kWh	4,168,922,201	
5	Amount of Adjustment (\$000)	\$33,100	

Ameren Missouri

Revenue-Neutral Adjustment to Base Rates of Other Major Customer Classes

Line	Class	Test Year Base Rate Revenue (000)	Adjustment* (000)
		(1)	(2)
1	Residential	\$1,298,918	\$16,254
2	Small General Service	316,651	3,962
3	Large General Service	593,843	7,431
4	Small Primary Service	228,989	2,865
5	Large Primary Service	206,716	2,588
6	Total	\$2,645,117	\$33,100

*1.2514%

EXEMPLAR Tariffs

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 54

CANCELLING MO.P.S.C. SCHEDULE NO.

APPLYING TO MISSOURI SERVICE AREA

Schedule MEB-4

SHEET NO.

SERVICE CLASSIFICATION NO. 1(M) RESIDENTIAL SERVICE RATE

RATE BASED ON MONTHLY METER READINGS

Summer Rate (Applicable during 4 monthly billing	
periods of June through September)	
Customer Charge - per month	\$8.00 \$ 8.10
Low-Income Pilot Program Charge - per month	\$0.03
Energy Charge - per kWh	11.36¢ 11.51¢
Energy Efficiency Program Charge - per kWh	0.12¢
Energy Efficiency Investment Charge - per kWh	0.33¢
<u>Winter Rate</u> (Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month	\$8.00 \$ 8.10
Low-Income Pilot Program Charge - per month	\$0.03
Energy Charge – per kWh First 750 kWh Over 750 kWh	-8.08¢ 8.19¢ -5.38¢ 5.45¢
Energy Efficiency Program Charge - per kWh	0.07¢
Energy Efficiency Investment Charge - per kWh	0.33¢
Optional Time-of-Day Rate	
Customer Charge - per month	\$16.81 \$17.03
Low-Income Pilot Program Charge - per month	\$ 0.03
Energy Charge - per kWh (1) Summer (June-September billing periods)	
All On Peak kWh	16.51¢ 16.73¢
All Off Peak kWh	-6.76 ¢ 6.85¢
Winter (October-May billing periods) All On Peak kWh	9.74¢ 9.87¢
All Off Peak kWh	4.82¢ 4.88¢
Energy Efficiency Program Charge - per kWh	
Summer (June-September billing periods)	0.12¢
Winter (October-May billing periods)	0.07¢
Energy Efficiency Investment Charge - per kWh	0.33¢
(1)On-peak and Off-peak hours applicable herein shall in Rider I, paragraph A.	be as specified

			Page 1 of 6
DATE OF ISSUE	<u>May 31, 2013</u>	DATE EFFECTIVE	June 30, 2013 -
ISSUED BY	Warner L. Baxter NAME OF OFFICER	President & CEO TITLE	St. Louis, Missouri ADDRESS

ELECTRIC SERVICE

EXEMPLAR Tariffs

MO.P.S.C. SCHEDULE NO. 6

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO. 55

Original

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 2(M) SMALL GENERAL SERVICE RATE

RATE BASED ON MONTHLY METER READINGS

Summer Rate (Applicable during 4 monthly billing	
periods of June through September)	
Customer Charge - per month	
Single Phase Service	\$9.74 \$ 9.86
Three Phase Service	\$19.49 \$19.74
Low-Income Pilot Program Charge - per month	\$ 0.05
Energy Charge - per kWh	10.34 ¢ 10.47¢
Energy Efficiency Program Charge - per kWh (3)	0.04¢
Energy Efficiency Investment Charge - per kWh (3)	0.16¢
<u>Winter Rate</u> (Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month	
Single Phase Service	\$9.74 \$ 9.86
Three Phase Service	\$19.49 \$19.74
Low-Income Pilot Program Charge - per month	\$ 0.05
Energy Charge - per kWh	
Base Use	7.71 ¢ 7.81¢
Seasonal Use(1)	4.45\$ 4.51¢
Energy Efficiency Program Charge - per kWh (3)	0.03¢
Energy Efficiency Investment Charge - per kWh (3)	0.16¢
Optional Time-of-Day Rate	
Customer Charge - per month	
Single Phase Service	\$19.53 \$19.78
Three Phase Service	\$39.05 \$39.55
Low-Income Pilot Program Charge - per month	\$ 0.05
Energy Charge - per kWh (2)	
Summer (June-September billing periods)	
All On Peak kWh	-15.35 ¢ 15.55¢
All Off Peak kWh	6.25 ¢ 6.33¢
Winter (October-May billing periods)	
All On Peak kWh	10.11 ¢ 10.24¢
All Off Peak kWh	-4.64 ¢ 4.70¢
Energy Efficiency Program Charge - per kWh (3)	
Summer (June-September billing periods)	0.04¢
Winter (October-May billing periods)	0.03¢
Energy Efficiency Investment Charge - per kWh (3)	0.16¢
(1) The winter seasonal energy use shall be all kWh in excess of	=

- (1) The winter seasonal energy use shall be all kWh in excess of 1,000 kWh per month <u>and</u> in excess of the lesser of a) the kWh use during the preceding May billing period, or b) October billing period, or c) the maximum monthly kWh use during any preceding summer month.
- (2) On-peak and Off-peak hours applicable herein shall be as specified in Rider I, paragraph A.
- (3) Not applicable to customers that have satisfied the opt-out provisions of Page 2 of 6 Section 393.1075, RSMo.

DATE OF ISSUE	May 31, 2013	DATE EFFECTIVE	June 30, 2013
ISSUED BY	Warner L. Baxter	President & CEO	St. Louis, Missouri
	NAME OF OFFICER	TITLE	ADDRESS

ELECTRIC SERVICE

Original

EXEMPLAR Tariffs

SHEET NO. 56

MO.P.S.C. SCHEDULE NO. 6

CANCELLING MO.P.S.C. SCHEDULE NO.

MISSOURI SERVICE AREA

SHEET NO.

APPLYING TO

SERVICE CLASSIFICATION NO. 3(M) LARGE GENERAL SERVICE RATE

RATE BASED ON MONTHLY METER READINGS

Summer Rate (Applicable during 4 monthly billing periods of June through September)	
Customer Charge - per month	\$88.32 \$89.47
Low-Income Pilot Program Charge - per month	\$ 0.50
Energy Charge - per kWh First 150 kWh per kW of Billing Demand Next 200 kWh per kW of Billing Demand All Over 350 kWh per kW of Billing Demand	-9.89 ¢ 10.02¢ -7.44 ¢ 7.54¢ -5.00 ¢ 5.06¢
Demand Charge - per kW of Total Billing Demand	\$ 4.62 \$ 4.68
Energy Efficiency Program Charge - per kWh (1)	0.08¢
Energy Efficiency Investment Charge - per kWh (1)	0.21¢
<u>Winter Rate</u> (Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month	\$88.32 \$89.47
Low-Income Pilot Program Charge - per month	\$ 0.50
Base Energy Charge - per kWh First 150 kWh per kW of Base Demand Next 200 kWh per kW of Base Demand All Over 350 kWh per kW of Base Demand	-6.23 ¢ 6.31¢ -4.62¢ 4.68¢ -3.63 ¢ 3.68¢
Seasonal Energy Charge - Seasonal kWh	3.63 ¢ 3.68¢
Demand Charge - per kW of Total Billing Demand	\$ 1.71 \$ 1.73
Energy Efficiency Program Charge - per kWh (1)	0.05¢

 Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments

Additional Customer Charge - per Month	<mark>\$19.75</mark> \$19.50 per	month
Energy Adjustment - per kWh	On-Peak Hours(2)	Off-Peak Hours(2)
Summer kWh(June-September billing periods)	+1.17¢	-0.66¢
Winter kWh(October-May billing periods)	+0.35¢	-0.20¢

(2) On-peak and off-peak hours applicable herein shall be as specified in Rider I, paragraph A. Page 3 of 6

DATE OF ISSU	E _May_31, 2013_ _	DATE EFFECTIVE	June 30, 2013 -
ISSUED BY	Warner L. Baxter	President & CEO	St. Louis, Missouri
	NAME OF OFFICER	TITLE	ADDRESS

ELECTRIC SERVICE

Original

EXEMPLAR Tariffs

MO.P.S.C. SCHEDULE NO. 6

CANCELLING MO.P.S.C. SCHEDULE NO.

SHEET NO. 57

SHEET NO.

APPLYING TO

MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 4(M)

SMALL PRIMARY SERVICE RATE

RATE BASED ON MONTHLY METER READINGS

Summer Rate (Applicable during 4 monthly billing periods of June through September)	
Customer Charge - per month	\$299.60 \$303.59
Low-Income Pilot Program Charge - per month	\$ 0.50
Energy Charge - per kWh First 150 kWh per kW of Billing Demand Next 200 kWh per kW of Billing Demand All Over 350 kWh per kW of Billing Demand	9.56 9.69¢ 7.20¢ 7.30¢ 4.83¢ 4.89¢
Demand Charge - per kW of Total Billing Demand	\$ 3.82 \$ 3.87
Reactive Charge - per kVar	35.00 ¢ 35.47¢
Energy Efficiency Program Charge - per kWh (1)	0.09¢
Energy Efficiency Investment Charge - per kWh (1)	0.22¢
<u>Winter Rate</u> (Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month	\$299.60 \$303.59
Low-Income Pilot Program Charge - per month	\$ 0.50
Base Energy Charge - per kWh First 150 kWh per kW of Base Demand Next 200 kWh per kW of Base Demand All Over 350 kWh per kW of Base Demand	6.02 6.10 4.47 4.53 3.50 3.55
Seasonal Energy Charge - Seasonal kWh	3.50 ¢ 3.55¢
Demand Charge - per kW of Total Billing Demand	\$ 1.39 \$ 1.41
Reactive Charge - per kVar	35.00 35.47¢
Energy Efficiency Program Charge - per kWh (1)	0.06¢
Energy Efficiency Investment Charge - per kWh (1)	0.22¢

 Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments	\$19.76	
Additional Customer Charge - per Month	\$19.50 per	month
Energy Adjustment - per kWh	On-Peak Hours(2)	Off-Peak Hours(2)
Summer kWh(June-September billing periods)	+0.85¢	-0.48¢
Winter kWh(October-May billing periods)	+0.32¢	-0.17¢

(2) On-peak and Off-peak hours applicable herein shall be as specified within this service classification.

			Schedule MEB-4 Page 4 of 6
DATE OF ISSUE	May 31, 2013	DATE EFFECTIVE	June 30, 2013
ISSUED BY	Warner L. Baxter NAME OF OFFICER	President & CEO TITLE	St. Louis, Missouri ADDRESS

EXEMPLAR Tariffs

MO.P.S.C. SCHEDULE NO. 6 Original SHEET NO. 61

CANCELLING MO.P.S.C. SCHEDULE NO.

APPLYING TO MISSOURI SERVICE AREA

_____ SHEET NO. _____

SERVICE CLASSIFICATION NO. 11(M) LARGE PRIMARY SERVICE RATE

RATE BASED ON MONTHLY METER READINGS

<u>Summer Rate</u> (Applicable during 4 monthly billing periods of June through September)	
Customer Charge - per month	\$299.60 \$303.41
Low-Income Pilot Program Charge - per month	\$ 50.00
Energy Charge - per kWh	3.24 ¢ 3.28¢
Demand Charge - per kW of Billing Demand	\$ 19.36 \$ 19.61
Reactive Charge - per kVar	35.000 35.45¢
Energy Efficiency Program Charge - per kWh (1)	0.04¢
Energy Efficiency Investment Charge - per kWh (1)	0.21¢

Winter Rate(Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month	\$299.60 \$303.41
Low-Income Pilot Program Charge - per month	\$ 50.00
Energy Charge - per kWh	2.87 ¢ 2.91¢
Demand Charge - per kW of Billing Demand	\$ 8.79 ^{\$} 8.90
Reactive Charge - per kVar	_35.00¢_ 35.45¢
Energy Efficiency Program Charge - per kWh (1)	0.03¢
Energy Efficiency Investment Charge - per kWh (1)	0.21¢

(1) Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments	\$19.75	
Additional Customer Charge - per month	\$19.50 per	month
Energy Adjustment - per kWh	On-Peak	Off-Peak
	Hours(2)	Hours(2)
Summer kWh(June-September billing periods)	+0.63¢	-0.35¢
Winter kWh(October-May billing periods)	+0.29¢	-0.15¢

(2) On-peak and off-peak hours applicable herein shall be as specified within this service classification.

			Schedule MEB-4 Page 5 of 6
DATE OF ISSUE	<u>May 31, 2013</u>	DATE EFFECTIVE	June 30, 2013
ISSUED BY	Warner L. Baxter NAME OF OFFICER	President & CEO TITLE	St. Louis, Missouri ADDRESS

EXEMPLAR Tariffs

		Original		
APPLYING TO	CANCELLING MO.P.S.C. SCHEDULE NO MISSOURI SERVICE A	AREA	SHEET NO.	
	MISCELLANEOUS CH	ARGES		
Α.	Reconnection Charges per Connection Point			
	Sheet No. 79, Par. B-3 (Annually Recurrin Sheet No. 145, Par. I (Reconnection of Se		\$30.00 \$30.00	
в.	Supplementary Service Minimum Monthly Cha	rges		
	Sheet No. 78, Par. C-3			
	Charges applicable during 4 monthly billing periods of June through September	Primary	Service Rate	
	Customer Charge per month, plus Low-Income Pilot Program Charge – per mon All kW @	th	\$299.60 \$303.41 \$50.00 \$19.36 \$ 19.61	
	Charges applicable during 8 monthly billing periods of October through May	Primary	Service Rate	
	Customer Charge per month, plus Low-Income Pilot Program Charge – per mon All kW @	th	\$299.60 \$303.41 \$50.00 \$8.79 \$ 8.90	

C. <u>Service Call Charge</u>

Customer's reporting service problems may be charged a \$50.00 fee for a service call, if it is determined the problem is within the customer's electrical system.

<u>Tax Adjustment</u> Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

DATE OF ISSUE	May 31, 2013	DATE EFFECTIVE	June 30, 2013
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	NAME OF OFFICER	TITLE	ADDRESS

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