Exhibit No.:	
Issue:	Fuel Adjustment Clause
Witness:	Maurice Brubaker
Type of Exhibit:	Direct Testimony
Sponsoring Party:	MIEC
Case No.:	EO-2012-0074
Date Testimony Prepared:	May 14, 2012

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Second Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company, d/b/a Ameren Missouri	)	**Case No. EO-2012-0074**

Direct Testimony and Schedules of

Maurice Brubaker

On behalf of

Missouri Industrial Energy Consumers

May 14, 2012
Project 9165

Brubaker & Associates, Inc.
Chesterfield, MO 63017

BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Second Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company, d/b/a Ameren Missouri	)	**Case No. EO-2012-0074**

STATE OF MISSOURI)
) **SS**
COUNTY OF ST. LOUIS)

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 the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my direct testimony and schedules which were prepared in written form for introduction into evidence in the Missouri Public Service Commission's Case No. EO-2012-0074.

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.

M. Brubaker
Maurice Brubaker

Subscribed and sworn to before me this 14th day of May, 2012.

MARIA E. DECKER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis City
My Commission Expires: May 5, 2013
Commission # 09706793

Maria E. Decker
Notary Public

BEFORE THE PUBLIC SERVICE
COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Second Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company, d/b/a Ameren Missouri	)	**Case No. EO-2012-0074**

Direct Testimony of Maurice Brubaker

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

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

Q WHAT IS YOUR OCCUPATION?

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

Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A This information is included in Appendix A to my testimony.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am appearing on behalf of the Missouri Industrial Energy Consumers ("MIEC"). MIEC member companies are large consumers of electricity and are materially impacted by Ameren Missouri's rates.

Q HAVE YOU REVIEWED AMEREN MISSOURI'S APPLICATION, TESTIMONY AND EXHIBITS FILED IN THIS MATTER?

A Yes, I have.

Q WHAT IS THE ISSUE IN THIS CASE?

A The basic issue is whether Ameren Missouri was correct in retaining the revenues, and consequently the margins, from sales under two bilateral contracts with American Electric Power Company ("AEP") and Wabash Valley Power Association, Inc. ("Wabash") during the period October 1, 2009 through May 31, 2011, or whether the margins from these sales should have flowed through Ameren Missouri's retail Fuel Adjustment Clause ("FAC") to retail customers.

Q WHAT IS THE SUBJECT OF YOUR TESTIMONY?

A I address Ameren Missouri's claims with respect to the nature of the sales to AEP and Wabash and the appropriate treatment in the FAC of revenues and expenses associated with these sales.

Q ARE ANY OTHER WITNESSES APPEARING ON BEHALF OF MIEC?

A Yes. My colleague, Greg Meyer, will offer testimony concerning a $3.3 million reduction to the margins that Ameren Missouri witness Gary Weiss proposes to make. It is Mr. Meyer's position that this adjustment would not be appropriate, and therefore should not be made.

Q PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.

A They may be summarized as follows:

1. The AEP and Wabash contracts at issue in this case are the same contracts that were at issue in Missouri Public Service Commission ("PSC") Case No. EO-2010-0255.

2. The only difference between this case and Case No. EO-2010-0255 is the period of time under consideration.

3. The AEP and Wabash contracts are not "requirements contracts" and therefore the revenues and expenses associated with these contracts should be flowed through the FAC.

4. The Commission should issue an order finding that the same treatment ordered in Case No. EO-2010-0255 is appropriate in this case.

5. If Ameren Missouri had not received the FAC that it requested, it would have been able to retain the margins from power sales in the wholesale market and the current issues would not have arisen.

6. Ameren Missouri has benefited substantially from the presence of the FAC, collecting nearly $200 million from its inception through January 2012.

The AEP and Wabash Contracts

Q HAS THE TREATMENT OF THESE CONTRACTS IN AMEREN MISSOURI'S FAC PREVIOUSLY BEEN CONSIDERED BY THE COMMISSION?

A Yes. In Missouri PSC Case No. EO-2010-0255, the Commission held hearings to consider the appropriate treatment of these contracts in Ameren Missouri's FAC over the period March 1, 2009 to September 30, 2009. The Commission issued its Report and Order on April 27, 2011 directing Ameren Missouri to refund $17.2 million to customers through an adjustment to its FAC charge to correct for an overcollection of revenues for the indicated period of time.

Q TO BE CLEAR, ARE THE CONTRACTS AT ISSUE IN THIS CASE THE SAME AS THE CONTRACTS THAT WERE AT ISSUE IN CASE NO. EO-2010-0255?

A Yes. These are the same two contracts that were previously at issue. The only difference between this case and the prior case is the time period under consideration.

Q WHAT IS YOUR POSITION ON THIS ISSUE?

A My position is that in accordance with the terms of the FAC, the margins from sales under these two bilateral contracts for the period now under review should have been treated like other off-system sales and flowed through the FAC to the benefit of retail customers. The contracts have not changed, other relevant facts have not changed, and the Commission should reach the same conclusion about treatment of these contracts as it did in Case No. EO-2010-0255.

Q WHAT IS AMEREN MISSOURI'S BASIS FOR CONTENDING THAT THE BENEFIT OF THE MARGINS FROM THESE SALES SHOULD NOT BE FLOWED THROUGH TO RATEPAYERS?

A Ameren Missouri maintains that they fall into the category of sales which may be excluded from off-system sales revenue ("OSSR") under the FAC. For reference, Sheet No. 98.3 to the FAC tariff effective March 1, 2009 is attached hereto as Schedule MEB-1. As stated in the tariff, all off-system sales flow through the FAC except "long-term full and partial requirements sales."

Q ARE THESE TWO BILATERAL CONTRACTS SHORT-TERM OR LONG-TERM REQUIREMENTS CONTRACTS?

A No. Requirements contracts (or requirements sales) are those wherein "requirements service" is provided. The commonly understood regulatory concept of "requirements service" is, and for many years has typically been, the provision of power to municipal customers, and sometimes rural electric cooperatives, on a basis whereby the selling utility incorporates the requirements of these customers (who typically have little or no generation of their own) into its resource planning. In fact, this is the definition provided by the Federal Energy Regulatory Commission ("FERC") in the instructions to filing the data requested on the "Sales for Resale" pages in the FERC Form 1 Report. Attached hereto as Schedule MEB-2, are pages 310-310.4, 311-311.4 and 450.1 (footnotes) from Ameren Missouri's 2009 FERC Form 1 Report. Sales for Resale are to be categorized as Requirements Service ("RQ"), Long-Term Firm Service ("LF"), Intermediate Term Firm Service ("IF"), Short-Term Firm Service ("SF"), Long-Term Unit Power Service ("LU") or Intermediate Term Service from a designated generating unit ("IU").

FERC defines Requirements Service as:

> Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.

Note that sales to the cities are designated as requirements service, while all other sales are not. In fact, in its 2009 FERC Form 1 Report, Ameren Missouri categorized the sales to AEP (page 310) and Wabash (page 310.3) as "IF" – Intermediate Firm Service, and not as "RQ" – Requirements Service.

Q ARE YOU AWARE OF ANY OTHER GENERALLY ACCEPTED SOURCES FOR THE DEFINITION OF REQUIREMENTS SERVICE?

A Yes. The Edison Electric Institute ("EEI"), a trade association for the investor-owned electric utility industry, publishes a "Glossary of Electric Industry Terms." I have attached as Schedule MEB-3 a copy of page 134 of that document which defines requirements service as:

> Requirements Service: Service that the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate customers.

This definition is the same as the definition included in the FERC Form 1 Report, and in his deposition Mr. Haro stated he did not disagree with it.[1]

Also, in his surrebuttal testimony in Case No. EO-2010-0255, Mr. Haro (page 7 of the surrebuttal testimony of Jaime Haro) referenced the FERC's Electronic Quarterly Report ("EQR") Data Dictionary. It defines requirements service as:

> Requirements Service: Firm, load-following power supply necessary to serve a specified share of customer's aggregate load during the term of the agreement.[2]

All public utilities and power marketers must file EQRs for each calendar quarter, and those EQRs must summarize the contractual terms and conditions for market-based power sales. Notably, Ameren Missouri did not classify either the AEP sale or the Wabash sale as "requirements contracts" in its EQR filings.

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[1]Haro November 19, 2010 Deposition in Case No. EO-2010-0255, pages 133-134.

[2]FERC Order No. 2001-1, Order Revising Electric Quarterly Report Data Dictionary, 125 FERC ¶61,103, Attachment, page 37.

Q BASED ON YOUR EXPERIENCE IN THE ELECTRIC UTILITY INDUSTRY, IS THIS THE COMMONLY UNDERSTOOD MEANING OF "REQUIREMENTS SERVICE"?

A Yes, it is.

Q WHAT IS THE NATURE OF THE SERVICES PROVIDED TO AEP AND WABASH?

A The bilateral contracts between Ameren Missouri and AEP and Ameren Missouri and Wabash both provide only electric capacity and energy service. Ameren Missouri is not providing any of the RTO or OATT services that are needed to complete a transaction. I have attached as Schedule MEB-4 a copy of pages attached to the Wabash contract which spell out the additional items that are the responsibility of the buyer (i.e., Wabash). At his deposition, Mr. Haro indicated that the same division of responsibilities applies to the AEP contract, wherein AEP is required to provide all of these services.[3]

Q HOW DOES THIS SERVICE DIFFER FROM THE SERVICE PROVIDED TO THE MUNICIPAL CUSTOMERS?

A The services provided to the municipalities include the capacity and energy service as well as all, or many, of the RTO and OATT charges. Schedule MEB-5 is a summary of the nature of the services provided by Ameren Missouri to these municipal customers. Obviously, Ameren Missouri provides substantially more service to these municipal customers than to AEP and Wabash under their bilateral one-off contracts. These service characteristics are typical of requirements service provided by utilities.

[3]Haro November 19, 2010 Deposition in Case No. EO-2010-0255, pages 137-138.

In contrast, the bilateral contracts with AEP and Wabash strictly provide capacity and energy, leaving the buyer to arrange the transmission, pay for transmission and for all other services required to accept the power from the seller.

Q **HOW DO THE CONTRACT DURATIONS COMPARE TO THE DURATION OF MUNICIPAL CONTRACTS?**

A In general, the municipal contracts are much longer in length. As contrasted to the 18-month duration of the Wabash contract and the 15-month duration of the AEP contract, the duration of the municipal contracts listed in the FERC Form 1 Report ranges from 29 months to 77 months. (Some municipalities, like the City of Kirkwood, have been customers for decades.)

Q **DOES THE FACT THAT THE CONFIRMATION LETTER WITH AEP STATES, AMONG OTHER THINGS, THAT THE CAPACITY AND ENERGY PROVIDED WILL "...ENABLE AEP TO PARTIALLY MEET LOAD SERVING REQUIREMENTS." AND THAT THE AGREEMENT WITH WABASH STATES, AMONG OTHER THINGS, THAT THE PRODUCT SHALL BE USED TO "...PARTIALLY MEET THE REQUIREMENTS THE CITIZENS ELECTRIC CORPORATION IN MISSOURI..." MAKE THESE AGREEMENTS REQUIREMENTS CONTRACTS?**

A No. These are incidental statements that have no meaning as to the character of the service supplied. Given that Ameren Missouri was seeking contracts that could be characterized as "long-term partial requirements" so as to qualify for exclusion from flowing the margin through the FAC,[4] it is not surprising that some of these words such as "load," "partially," and "requirements" would appear as incidental language in

[4]Haro November 19, 2010 Deposition in Case No. EO-2010-02555, page 139.

these documents. Calling these transactions requirements service does not make them so anymore than calling a dog a duck makes it quack. They are what they are, and they are not requirements contracts.

Q TO THE EXTENT THAT THERE ARE ANY DIFFERENCES IN TERMINOLOGY BETWEEN A REGULATED RETAIL RATE CONTEXT AND A COMPETITIVE WHOLESALE MARKET CONTEXT, WHICH CONCEPTS SHOULD GUIDE THE COMMISSION'S DECISION?

A The regulatory context is clearly more relevant here because the Commission sets rates in the regulated retail context. It is not setting rates in the wholesale market, and thus if there are differences in terminology, the traditional interpretations from the regulated retail ratemaking context are the most appropriate and are the ones that should be used.

Other Matters

Q TURNING NOW TO SOME OTHER MATTERS, HOW DO YOU RESPOND TO AMEREN MISSOURI WITNESS LYNN BARNES' DIRECT TESTIMONY AT PAGE 5 THAT ". . . NOT FOLLOWING THE TARIFF IS NOT A MATTER OF WHETHER THE COMPANY WAS 'PRUDENT,' BUT RATHER, IS AN ALLEGATION THAT THE COMPANY DID NOT FOLLOW THE LAW . . ."?

A I disagree. While, like Ms. Barnes, I am not an attorney and do not pretend to offer a legal opinion, it is my considered opinion that it is generally imprudent for the Company to violate the law.

Q **AT PAGE 9, LINE 4 OF HER TESTIMONY, MS. BARNES DESCRIBES THE LOSS OF THE NORANDA LOAD AS A ". . . DEVASTATING FINANCIAL BLOW . . ." AND AT LINE 13 OF PAGE 13 ASSERTS THAT AMEREN MISSOURI WAS ". . . FACED WITH A CATASTROPHIC FINANCIAL LOSS . . ." HOW DO YOU RESPOND?**

A While I agree that the ice storm and the resulting loss of load was a major event, it hardly rises to the level of "devastating" or "catastrophic." After considering the reduction in income taxes, the net impact of the previously ordered $17 million refund, plus the refund amount at issue in this case amounts to less than a 70 basis points return on equity (0.70%).

Q **IN ADDITION TO THE ICE STORM AND THE LOSS OF LOAD THAT MS. BARNES DESCRIBES, ARE THERE OTHER FACTORS THAT CONTRIBUTED TO THE IMPACTS THAT MS. BARNES DESCRIBES?**

A Yes. Had Ameren Missouri not received the FAC that it had asked for, power that otherwise would have been sold to Noranda would have been sold in the wholesale market and the net revenues from such sales would have been retained by Ameren Missouri's stockholders.

Q **AT PAGE 10, LINE 12 OF HER TESTIMONY, MS. BARNES INDICATES THAT IN THE SHORT RUN AMEREN MISSOURI'S ONLY OPTION WAS TO SELL THE POWER NORANDA WAS NO LONGER USING INTO THE OFF-SYSTEM MARKET. DO YOU AGREE?**

A No. Ameren Missouri could have filed an application with the Missouri Public Service Commission requesting permission to withdraw its FAC tariff.

Q **DID AMEREN MISSOURI DO SO?**

A No, it did not.

Q **HAS AMEREN MISSOURI BENEFITTED FROM THE PRESENCE OF THE FAC?**

A Yes. Substantially. Since the inception of the FAC, Ameren Missouri has refunded only roughly $4 million to Missouri ratepayers,[5] compared to the nearly $200 million it has collected as a result of the FAC through January 2012.

Q **DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

A Yes, it does.

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[5]Excluding the $17 million refund required as a result of the inappropriate treatment of the AEP and Wabash sales.

Qualifications of Maurice Brubaker

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

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

Q PLEASE STATE YOUR OCCUPATION.

A I am a consultant in the field of public utility regulation and President of the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I was graduated from the University of Missouri in 1965, with a Bachelor's Degree in Electrical Engineering. Subsequent to graduation I was employed by the Utilities Section of the Engineering and Technology Division of Esso Research and Engineering Corporation of Morristown, New Jersey, a subsidiary of Standard Oil of New Jersey.

In the Fall of 1965, I enrolled in the Graduate School of Business at Washington University in St. Louis, Missouri. I was graduated in June of 1967 with the Degree of Master of Business Administration. My major field was finance.

From March of 1966 until March of 1970, I was employed by Emerson Electric Company in St. Louis. During this time I pursued the Degree of Master of Science in Engineering at Washington University, which I received in June, 1970.

In March of 1970, I joined the firm of Drazen Associates, Inc., of St. Louis, Missouri. Since that time I have been engaged in the preparation of numerous 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 services, cost forecasts, cogeneration rates and determinations of rate base and operating income. I have also addressed utility resource planning principles and plans, reviewed capacity additions to determine whether or not they were used and useful, addressed demand-side management issues independently and as part of least cost planning, and have reviewed utility determinations of the need for capacity additions and/or purchased power to determine the consistency of such plans with least cost planning principles. I have also testified about the prudency of the actions undertaken by utilities to meet the needs of their customers in the wholesale power markets and have recommended disallowances of costs where such actions were 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.

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.

An increasing portion of the firm's activities is concentrated in the areas of competitive procurement. While the firm has always assisted its clients in negotiating contracts for utility services in the regulated environment, increasingly there are opportunities for certain customers to acquire power on a competitive basis from a supplier other than its traditional electric utility. The firm assists clients in identifying and evaluating purchased power options, conducts RFPs and negotiates with suppliers for the acquisition and delivery of supplies. We have prepared option studies and/or conducted RFPs for competitive acquisition of power supply for industrial and other end-use customers throughout the Unites States and in Canada, 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 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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* RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

adjustments included in commodity and transportation costs, broker commissions and fees associated with price hedges, oil costs, ash disposal revenues and expenses, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and

(ii) the following costs reflected in FERC Account Number 547: natural gas generation costs related to commodity, oil, transportation, storage, capacity reservation charges, fuel losses, hedging costs, and revenues and expenses resulting from fuel and transportation portfolio optimization activities;

b) Costs in FERC Account Number 518 (Nuclear Fuel Expense).

CPP = Costs of purchased power reflected in FERC Account Numbers 555, 565, and 575, excluding MISO administrative fees arising under MISO Schedules 10, 16, 17, and 24, and excluding capacity charges for contracts with terms in excess of one (1) year, incurred to support sales to all Missouri retail customers and Off-System Sales allocated to Missouri retail electric operations. Also included in factor "CPP" are insurance premiums in FERC Account Number 924 for replacement power insurance (other than relating to the Taum Sauk Plant) to the extent those premiums are not reflected in base rates. Changes in replacement power insurance premiums (other than those relating to the Taum Sauk Plant) from the level reflected in base rates shall increase or decrease purchased power costs. Additionally, costs of purchased power will be reduced by expected replacement power insurance recoveries (other than those relating to the Taum Sauk Plant) qualifying as assets under Generally Accepted Accounting Principles. Notwithstanding the foregoing, concurrently with the date the "TS" factor is eliminated as provided for in this tariff, the premiums and recoveries relating to replacement power insurance coverage for the Taum Sauk Plant shall be included in this CPP Factor.

OSSR = Revenues from Off-System Sales allocated to Missouri electric operations.

Off-System Sales shall include all sales transactions (including MISO revenues in FERC Account Number 447), excluding Missouri retail sales and long-term full and partial requirements sales, that are associated with (1) AmerenUE Missouri jurisdictional generating units, (2) power purchases made to serve Missouri retail load, and (3) any related transmission.

* Indicates Addition.

Name of Respondent	This Report Is:	Date of Report (Mo, Da, Yr)	Year/Period of Report
UNION ELECTRIC COMPANY	(1) [X] An Original (2) [ ] A Resubmission	04/19/2010	End of 2009/Q4

SALES FOR RESALE (Account 447)

1. Report all sales for resale (i.e., sales to purchasers other than ultimate consumers) transacted on a settlement basis other than power exchanges during the year. Do not report exchanges of electricity (i.e., transactions involving a balancing of debits and credits ·· energy, capacity, etc.) and any settlements for imbalanced exchanges on this schedule. Power exchanges must be reported on the ·hased Power schedule (Page 326-327).
.nter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.
3. In column (b), enter a Statistical Classification Code based on the original contractual terms and conditions of the service as follows:
RQ - for requirements service. Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.
LF - for long-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.
IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.
SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.
LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.
IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line No.	Name of Company or Public Authority (Footnote Affiliations) (a)	Statistical Classifi-cation (b)	FERC Rate Schedule or Tariff Number (c)	Average Monthly Billing Demand (MW) (d)	Actual Demand (MW) Average Monthly NCP Demand (e)	Average Monthly CP Demand (f)
	Requirements Service					
.	Centralia, MO	RQ	1	7		
3	Hannibal, MO	RQ	1	45		
4	Kahoka, MO	RQ	1	6		
5	Kirkwood, MO	RQ	1	36		
6	Marceline, MO	RQ	1	6		
7	Perry, MO	RQ	1	45		
8						
9	VARIATION IN UNBILLED-	RQ				
10						
11	American Electric Power Cooperative	IF	1			
12	American Electric Power Cooperative	SF	1			
13	Associated Electric	SF	1			
14	Arkansas Electric Cooperative Corp.	SF	1			
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

Schedule MEB-2
Page 1 of 11

SALES FOR RESALE (Account 447)

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2. Enter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.
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LF - for long-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.
IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.
SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.
LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.
IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line No.	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classification	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual Demand (MW)	
					Average Monthly NCP Demand	Average Monthly CP Demand
	(a)	(b)	(c)	(d)	(e)	(f)
1	BP Energy Company	SF	1			
2	Miscellaneous					
3	Cargill/Alliant, LLC	SF	1			
4	CINERGY Services, Inc.	SF	1			
5	Central Illinois Light Co. (Affiliate)	SF				
6	Central IL Pub Serv Co. (Affiliate)	SF				
7	Cobb Electric	SF	1			
8	Citigroup	SF	1			
9	Constellation Power Source, Inc.	SF	1			
10	DTE Energy Trading, Inc.	SF	1			
11	Eagle Energy	SF	1			
12	Empire District Electric	SF	1			
13	Endur Energy	SF	1			
14	Entergy Services	SF	1			
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

Schedule MEB-2
Page 2 of 11

Name of Respondent UNION ELECTRIC COMPANY	This Report Is: (1) [X] An Original (2) [ ] A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of 2009/Q4

SALES FOR RESALE (Account 447)

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LF - for long-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.
IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.
SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.
LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.
IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line No.	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classification	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual Demand (MW)	
					Average Monthly NCP Demand	Average Monthly CP Demand
	(a)	(b)	(c)	(d)	(e)	(f)
	Integry's	SF	1			
	Illinois Power Co. (Affiliate)	SF	1			
3	J. Aron	SF	1			
4	JP Morgan	SF	1			
5	Kansas City Power & Light Co	SF	1			
6	LG&E Energy Marketing Inc.	SF	1			
7	Midwest Independent System Operator	SF	1			
8	Morgan Stanley Capital Group	SF	1			
9	Next Era Energy	SF	1			
10	NRG Power	SF	1			
11	Omaha Public Power District	SF	1			
12	PJM Interconnection	SF	1			
13	City of Perry	SF	1			
14	Rainbow Energy Marketing Corporation	SF	1			
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

SALES FOR RESALE (Account 447)

1. Report all sales for resale (i.e., sales to purchasers other than ultimate consumers) transacted on a settlement basis other than power exchanges during the year. Do not report exchanges of electricity (i.e., transactions involving a balancing of debits and credits for energy, capacity, etc.) and any settlements for imbalanced exchanges on this schedule. Power exchanges must be reported on the Purchased Power schedule (Page 326-327).
2. Enter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.
3. In column (b), enter a Statistical Classification Code based on the original contractual terms and conditions of the service as follows:
RQ - for requirements service. Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.
LF - for tong-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.
IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.
SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.
LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.
IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line No.	Name of Company or Public Authority (Footnote Affiliations) (a)	Statistical Classification (b)	FERC Rate Schedule or Tariff Number (c)	Average Monthly Billing Demand (MW) (d)	Actual Demand (MW) Average Monthly NCP Demand (e)	Actual Demand (MW) Average Monthly CP Demand (f)
1	Sempra Energy Trading Corporation	SF	1			
2	Southern Company Services	SF	1			
3	Strategic Energy	SF	1			
4	Suez Energy Marketing	SF	1			
5	TransAlta Energy Marketing (US) Inc.	SF	1			
6	Tennessee Valley Authority	SF	1			
7	The Energy Authority	SF	1			
8	Tenaska Power Source	SF	1			
9	Wabash	IF	1			
10	Westar Energy	SF	1			
11	Western Area Power Administration	SF	1			
12	Realized gains and losses on derivative	SF	1			
13	transactions					
14	Unrealized gains and losses on	OS				
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

Schedule MEB-2
Page 4 of 11

SALES FOR RESALE (Account 447)

1. Report all sales for resale (i.e., sales to purchasers other than ultimate consumers) transacted on a settlement basis other than power exchanges during the year. Do not report exchanges of electricity (i.e., transactions involving a balancing of debits and credits ⁻ ⁻ energy, capacity, etc.) and any settlements for imbalanced exchanges on this schedule. Power exchanges must be reported on the hased Power schedule (Page 326-327).

.nter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.

3. In column (b), enter a Statistical Classification Code based on the original contractual terms and conditions of the service as follows:

RQ - for requirements service. Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.

LF - for long-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.

IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.

SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.

LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.

IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line No.	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classification	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual Demand (MW)	
					Average Monthly NCP Demand	Average Monthly CP Demand
	(a)	(b)	(c)	(d)	(e)	(f)
	derivative transactions					
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

SALES FOR RESALE (Account 447) (Continued)

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature of the service in a footnote.
AD - for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting years. Provide an explanation in a footnote for each adjustment.
4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)
5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.
6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)
demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.
7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.
8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.
9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401,line 24.
10. Footnote entries as required and provide explanations following all required data.

MegaWatt Hours Sold (g)	REVENUE Demand Charges ($) (h)	Energy Charges ($) (i)	Other Charges ($) (j)	Total ($) (h+i+j) (k)	Line No.
					1
3,258	38,214	69,645		107,859	2
25,109	249,242	494,997		744,239	3
22,615	31,452	1,314,202		1,345,654	4
212,328	197,399	15,799,589		15,996,988	5
31,428	35,468	1,879,215		1,914,683	6
9,706		570,838		570,838	7
					8
-27,453		-593,000		-593,000	9
					10
734,400		23,537,520		23,537,520	11
18,747	413,628	593,607		1,007,235	12
47,372		1,480,816		1,480,816	13
24,178		957,609		957,609	14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208	**9,444,000**	**378,030,162**	**71,188,223**	**458,662,385**	

SALES FOR RESALE (Account 447) (Continued)

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature ' the service in a footnote.
for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting s. Provide an explanation in a footnote for each adjustment.

4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)
5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.
6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)
demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.
7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.
8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.
9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401,line 24.
10. Footnote entries as required and provide explanations following all required data.

MegaWatt Hours Sold (g)	REVENUE Demand Charges ($) (h)	Energy Charges ($) (i)	Other Charges ($) (j)	Total ($) (h+i+j) (k)	Line No.
9,600	36,400	303,920		340,320	1
			-447,857	-447,857	2
136,880		4,916,781		4,916,781	3
		3,095,000		3,095,000	4
	444,064		31,038	475,102	5
	862,700		71,946	934,646	6
20,750		758,650		758,650	7
585		20,475		20,475	8
17,600	1,125,000	660,000		1,785,000	9
	473,000			473,000	10
45,867	39,000	1,663,925		1,702,925	11
9,824		334,913		334,913	12
5,600		206,800		206,800	13
62,816		2,167,322		2,167,322	14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208	9,444,000	378,030,162	71,188,223	458,662,385	

Name of Respondent 20100427-8007 FERC PDF (Unofficial) 04/19/2010 UNION ELECTRIC COMPANY	This Report Is: (1) [X] An Original (2) [ ] A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of 2009/Q4

SALES FOR RESALE (Account 447) (Continued)

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature of the service in a footnote.
AD - for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting years. Provide an explanation in a footnote for each adjustment.
4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)
5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.
6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)
demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.
7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.
8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.
9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401,line 24.
10. Footnote entries as required and provide explanations following all required data.

MegaWatt Hours Sold (g)	REVENUE Demand Charges ($) (h)	Energy Charges ($) (i)	Other Charges ($) (j)	Total ($) (h+i+j) (k)	Line No.
	1,252,500			1,252,500	1
	1,310,403		97,470	1,407,873	2
44,034		1,414,392		1,414,392	3
46,400		1,685,200		1,685,200	4
335,506		11,589,397		11,589,397	5
35,202		1,017,285		1,017,285	6
10,884,457		261,707,117	9,128,236	270,835,353	7
102,400		3,175,800		3,175,800	8
	76,000			76,000	9
122,063		3,379,429		3,379,429	10
39,798		1,881,100		1,881,100	11
189,269		6,968,533	-27,380	6,941,153	12
		16,028		16,028	13
4,761		199,928		199,928	14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208	**9,444,000**	**378,030,162**	**71,188,223**	**458,662,385**	

SALES FOR RESALE (Account 447) (Continued)

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature ˉthe service in a footnote.

· for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting s. Provide an explanation in a footnote for each adjustment.

4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)

5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.

6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)
demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.

7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.

8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.

9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401,line 24.

10. Footnote entries as required and provide explanations following all required data.

MegaWatt Hours Sold (g)	REVENUE Demand Charges ($) (h)	Energy Charges ($) (i)	Other Charges ($) (j)	Total ($) (h+i+j) (k)	Line No.
	2,449,830			2,449,830	1
63,782		2,136,429		2,136,429	2
	408,950			408,950	3
	750			750	4
		-11,470		-11,470	5
66,574		2,165,572		2,165,572	6
-588		-25,028		-25,028	7
6,183		228,206		228,206	8
505,600		16,482,560		16,482,560	9
106,707		3,754,610		3,754,610	10
850		32,250		32,250	11
			62,334,770	62,334,770	12
					13
					14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208	**9,444,000**	**378,030,162**	**71,188,223**	**458,662,385**	

SALES FOR RESALE (Account 447) (Continued)

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature of the service in a footnote.
AD - for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting years. Provide an explanation in a footnote for each adjustment.
4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)
5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.
6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)
demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.
7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.
8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.
9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401,line 24.
10. Footnote entries as required and provide explanations following all required data.

MegaWatt Hours Sold (g)	REVENUE Demand Charges ($) (h)	Energy Charges ($) (i)	Other Charges ($) (j)	Total ($) (h+i+j) (k)	Line No.
					1
					2
					3
					4
					5
					6
					7
					8
					9
					10
					11
					12
					13
					14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208	**9,444,000**	**378,030,162**	**71,188,223**	**458,662,385**	

Name of Respondent	This Report is:	Date of Report (Mo, Da, Yr)	Year/Period of Report
UNION ELECTRIC COMPANY	(1) X An Original (2) _ A Resubmission	04/19/2010	2009/Q4

FOOTNOTE DATA

Schedule Page: 310.1 Line No.: 2 Column: j

Amount represents Broker Fees

Schedule Page: 310.1 Line No.: 5 Column: j

Amount represents ancilliary services.

Schedule Page: 310.1 Line No.: 6 Column: j

Amount represents ancilliary services.

Schedule Page: 310.2 Line No.: 2 Column: j

Amount represents ancilliary services.

Schedule Page: 310.2 Line No.: 7 Column: j

Detail of the Other Charges resulting from sales to the Midwest Independent System Operator are as follows:

Inadvertent Energy	$	321,274
Revenue Sufficiency Guarantees		3,196,971
Regulation & Frequency Reserve Service		2,790,636
Spinning Reserve Service		2,160,676
Supplemental Reserve Service		658,679
Total	$	9,128,236

Schedule Page: 310.2 Line No.: 12 Column: j

Amount represents PJM Losses.

Schedule Page: 310.3 Line No.: 12 Column: j

Represents gains and losses on derivative instruments lacking a physical delivery of power and broker fees.

Schedule Page: 310.3 Line No.: 14 Column: j

A total of $3,012,991 has been excluded from disclosure on this page. This amount represents unrealized gains and losses on derivatives designated as hedges. It is excluded from disclosure as the underlying physical or sale has not yet occurred.

Renewable Resources Any source of energy that is continually available or that can be renewed or replaced. Examples include wind, solar, geothermal, hydro, photovoltaic, wood and waste. Nonrenewable energy sources include coal, oil, and gas, that all exist in finite amounts.

Replacement Cost An estimate of the cost to replace the existing facilities either as currently structured or as redesigned to embrace new technology with facilities that will perform the same functions. This method recognizes the benefits of presently available technology in replacing the system. For example, a number of small generating units may be replaced with a single large unit at lower unit costs and greater efficiency. See also *Reproduction Cost.*

Replacement Power Power that a utility must purchase when one of its own plants (or other long-term suppliers) experiences an outage or is otherwise unavailable.

Replacements The substitution of a unit of Utility Plant for another unit generally of a like or improved character.

Repowering A means of increasing the output and efficiency of conventional thermal generating facilities. For example, adding combustion turbines to supplement or replace steam from fuel combustion used to power steam turbines.

Reprocessing See *Recycling.*

Reproduction Cost The estimated cost to reproduce existing properties in their current form and capability at current cost levels. The mechanics may involve a trending of the original cost dollars to reflect current costing factors, or they may involve a property appraisal accompanied by estimates to reconstruct the facilities. The former is most often utilized as Rate Base.

Repurchase Agreements (Repo) A means of temporarily adding to monetary reserves. The Fed buys government securities under a contract to sell them back at an agreed price and date. Generally repurchase agreements mature within one to seven days (maximum is 15 days). Dealers may usually repurchase before the maturity of the agreement if they wish. Interest rate is determined by auction.

Requirements Service Service that the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate customers.

Rerating A change in the capability of a generator due to a change in conditions such as age, upgrades, auxiliary equipment, cooling, etc.

Reregulation The design and implementation of regulatory practices to be applied to the remaining regulated entities after restructuring of the vertically-integrated electric utility. The remaining regulated entities would be those that continue to exhibit characteristics of a natural monopoly, where imperfections in the market prevent the realization of more competitive results, and where, in light of other policy considerations, competitive results are unsatisfactory in one or more respects. Regulation could employ the same of different regulatory practices as those used before restructuring.

APPENDIX B – RESPONSIBILITY FOR REGIONAL TRANSMISSION ORGANIZATION CHARGES AND OTHER CHARGES

Day Ahead Charges	Party Responsible for Charges
DA Asset Energy Amount	Buyer
DA Financial Bilateral Congestion	Buyer
DA Financial Bilateral Loss	Buyer
DA Market Administration	Buyer
DA Non-Asset Energy Amount	Buyer
DA Congestion Rebate on Carve-out GFA	Buyer
DA Losses Rebate on Carve-out GFA	Buyer
DA Congestion Rebate on Option B GFA	Buyer
DA Losses Rebate on Option B GFA	Buyer
DA Revenue Sufficiency Guarantee Distribution	Buyer
DA Revenue Sufficiency Guarantee Make Whole	Buyer
DA Schedule 24 Allocation Amount	Buyer
DA Virtual Energy Amount	Buyer
DA Regulation Amount	Buyer
DA Spinning Reserve Amount	Buyer
DA Supplemental Reserve Amount	Buyer

FTR Charges	Party Responsible for Charges
FTR Hourly Allocation	Buyer
FTR Market Administration	Buyer
FTR Monthly Allocation	Buyer
FTR Transaction	Buyer
FTR Yearly Allocation	Buyer
FTR Full Funding Guarantee Amount	Buyer
FTR Guarantee Uplift Amount	Buyer

Real Time Charges	Party Responsible for Charges
RT Asset Energy	Buyer
RT Distribution of Losses	Buyer
RT Financial Bilateral Transmission Congestion	Buyer
RT Financial Bilateral Transmission Loss	Buyer
RT Congestion Rebate on Carve-out GFA	Buyer
RT Losses Rebate on Carve-out GFA	Buyer
RT Market Administration	Buyer
RT Miscellaneous	Buyer
RT Net Inadvertent Distribution	Buyer
RT Non-asset Energy	Buyer
RT Revenue Neutrality Uplift	Buyer
RT Revenue Sufficiency Guarantee 1st Pass Distribution	Buyer
RT Revenue Sufficiency Guarantee Make Whole	Buyer
RT Uninstructed Deviation	Buyer
RT Schedule 24 Allocation Amount	Buyer
RT Schedule 24 Distribution Amount	Buyer
RT Virtual Energy	Buyer
RT Regulation Amount	Buyer
RT Spinning Reserve Amount	Buyer

RT Supplemental Reserve Amount	Buyer
Non-Excessive Energy Amount	Buyer
Excessive Energy Amount	Buyer
Regulation Cost Distribution Amount	Buyer
Spinning Reserve Cost Distribution Amount	Buyer
Supplemental Reserve Cost Distribution Amount	Buyer
Net Regulation Adjustment Amount	Buyer
Regulation Penalty Amount	Buyer
Contingency Reserve Deployment Failure Penalty Amount	Buyer

OATT Charges

DESCRIPTION	RESPONSIBILITY
Schedule 1 – Scheduling System Control and Dispatch Service	Buyer
Schedule 2 - Reactive Supply And Voltage Control/Generation Sources Service	Buyer
Schedule 3 - Regulation and Frequency Response Service	Buyer
Schedule 4 - Energy Imbalance Service	Buyer (if applicable)
Schedule 5 - Operating Reserve Spinning Reserve Service	Buyer
Schedule 6 - Operating Reserve Supplemental Reserve Service	Buyer
Schedule 7 - Long Term/Short Term Firm Point-to-Point Transmission Service	N/A
Schedule 8 - Non Firm Point-to-Point Transmission Service	N/A
Schedule 9 - Network Integration Transmission Service	Buyer
Schedule 10 - ISO Cost Recovery Adder	Buyer
Schedule 11 - Wholesale Distribution Service	Buyer (if applicable)
Schedule 12 - Gross Receipts Tax Adder	N/A
Schedule 13 - Calculation and Use of Reserved Capacity Multipliers Transmission Customers Serving Loads Within International's Service Area	N/A
Schedule 14 - Regional Through and Out Rate	N/A
Schedule 15 - Power Factor Correction Service	Buyer (if applicable)
Schedule 16 - Financial Transmission Rights Administrative Service Cost Recovery Adder	Buyer
Schedule 17 - Energy Market Support Cost Recovery Adder	Buyer
Schedule 18 - Sub Regional Rate Adjustment	N/A
Schedule 19 - Zonal Transition Adjustment	N/A
Schedule 20 - Treatment of Station Power	N/A
Schedule 21 - Interim SECA Charge Applicable to PJM Entities	N/A
Schedule 22 - SECA Charges to Midwest ISO Zone, Sub-Zones and Customers	N/A
Schedule 23 - Recovery of Schedule 10 and Schedule 17 Costs from Certain GFA's	N/A
Schedule 24 - Control Area Operator Cost Recovery	Buyer
Schedule 25 - Cross Border Cost Allocation Tariff Provisions	N/A
Schedule 26 - Network Upgrade Charge from Transmission Expansion Plan	Buyer

Appendix B - Responsibility for Regional Transmission Organization Charges and Other Charges

Contract	Wabash Power Association	AEP	City of Kahoka	City of Kirkwood	City of Marceline	City of Perry
Day Ahead Charges	Party Responsible for Charges					
DA Asset Energy Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Financial Bilateral Congestion	Buyer	Buyer***	Seller	Buyer	Seller	Seller
DA Financial Bilateral Loss	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Market Administration	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Non-Asset Energy Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Congestion Rebate on Carve-out GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Losses Rebate on Carve-out GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Congestion Rebate on Option B GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Losses Rebate on Option B GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Revenue Sufficiency Guarantee Distribution	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Revenue Sufficiency Guarantee Make Whole	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Schedule 24 Allocation Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Virtual Energy Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
DA Regulation Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
DA Spinning Reserve Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
DA Supplemental Reserve Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
FTR Charges	Party Responsible for Charges					
FTR Hourly Allocation	Buyer	Buyer***	Seller	Buyer	Seller	Seller
FTR Market Administration	Buyer	Buyer***	Seller	Buyer	Seller	Seller
FTR Monthly Allocation	Buyer	Buyer***	Seller	Buyer	Seller	Seller
FTR Transaction	Buyer	Buyer***	Seller	Buyer	Seller	Seller
FTR Yearly Allocation	Buyer	Buyer***	Seller	Buyer	Seller	Seller
FTR Full Funding Guarantee Amount	Buyer	Buyer***	N/a*	Buyer	N/a*	N/a*
FTR Guarantee Uplift Amount	Buyer	Buyer***	N/a*	Buyer	N/a*	N/a*
Real Time Charges	Party Responsible for Charges					
RT Asset Energy	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Distribution of Losses	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Financial Bilateral Transmission Congestion	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Financial Bilateral Transmission Loss	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Congestion Rebate on Carve-out GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Losses Rebate on Carve-out GFA	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Market Administration	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Miscellaneous	Buyer	Buyer***	Seller	TBD**	Seller	Seller
RT Net Inadvertent Distribution	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Non-asset Energy	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Revenue Neutrality Uplift	Buyer	Buyer***	Seller	Buyer	Seller	Seller
RT Revenue Sufficiency Guarantee 151 Pass Distribution	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Revenue Sufficiency Guarantee Make Whole	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Uninstructed Deviation	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Schedule 24 Allocation Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Schedule 24 Distribution Amount	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Virtual Energy	Buyer	Buyer***	Seller	Seller	Seller	Seller
RT Regulation Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
RT Spinning Reserve Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
RT Supplemental Reserve Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Non-Excessive Energy Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Excessive Energy Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Regulation Cost Distribution Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Spinning Reserve Cost Distribution Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Supplemental Reserve Cost Distribution Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Net Regulation Adjustment Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Regulation Penalty Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*
Contingency Reserve Deployment Failure Penalty Amount	Buyer	Buyer***	N/a*	Seller	N/a*	N/a*

* Information not explicitly defined in contract

** To be determined based on information at that time

*** Ameren whiteness Haro stated in his deposition that AEP is the same as Wabash Power Association with regard to RTO/transmission charges

OATT Charges

CONTRACT	Wabash Power Association	AEP	City of Kahoka	City of Kirkwood	City of Marceline	City of Perry
DESCRIPTION	RESPONSIBILITY					
Schedule 1 - Scheduling System Control and Dispatch Service	Buyer	Buyer**	Buyer	Buyer	Buyer	N/a*
Schedule 2 - Reactive Supply And Voltage Control/Generation Sources Service	Buyer	Buyer**	Buyer	Buyer	Buyer	N/a*
Schedule 3 - Regulation and Frequency Response Service	Buyer	Buyer**	Seller	Seller	Seller	N/a*
Schedule 4 - Energy Imbalance Service	Buyer (if applicable)	Buyer (if applicable)**	Seller (if applicable)	Seller (if applicable)	Seller (if applicable)	N/a*
Schedule 5 - Operating Reserve Spinning Reserve Service	Buyer	Buyer**	Seller	Seller	Seller	N/a*
Schedule 6 - Operating Reserve Supplemental Reserve Service	Buyer	Buyer**	Seller	Seller	Seller	N/a*
Schedule 7 - Long Term/Short Term Firm Point-to-Point Transmission Service	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 8 - Non Firm Point-to-Point Transmission Service	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 9 - Network Integration Transmission Service	Buyer	Buyer**	Buyer	Buyer	Buyer	N/a*
Schedule 10 - ISO Cost Recovery Adder	Buyer	Buyer**	Buyer	Buyer	Buyer	N/a*
Schedule 11 - Wholesale Distribution Service	Buyer (if applicable)	Buyer (if applicable)**	Buyer (if applicable)	Buyer (if applicable)	Buyer (if applicable)	N/a*
Schedule 12 - Gross Receipts Tax Adder	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 13 - Calculation and Use of Reserved Capacity Multipliers Transmission Customers Serving Loads Within International's Service Area	N/A	N/A**	N/A	N/A	N/A	N/a*
Schedule 14 - Regional Through and Out Rate	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 15 - Power Factor Correction Service	Buyer (if applicable)	Buyer (if applicable)**	Buyer (if applicable)	Buyer (if applicable)	Buyer (if applicable)	N/a*
Schedule 16 - Financial Transmission Rights Administrative Service Cost Recovery Adder	Buyer	Buyer**	Seller	Buyer	Seller	N/a*
Schedule 17 - Energy Market Support Cost Recovery Adder	Buyer	Buyer**	Seller	Seller	Seller	N/a*
Schedule 18 - Sub Regional Rate Adjustment	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 19 - Zonal Transition Adjustment	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 20 - Treatment of Station Power	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 21 - Interim SECA Charge Applicable to PJM Entities	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 22 - SECA Charges to Midwest ISO Zone, Sub-Zones and Customers	N/A	N/A**	N/A	N/A	N/A	N/a*
Schedule 23 - Recovery of Schedule 10 and Schedule 17 Costs from Certain GFA's	N/A	N/A**	N/A	N/A	N/A	N/a*
Schedule 24 - Control Area Operator Cost Recovery	Buyer	Buyer**	Seller	Seller	Seller	N/a*
Schedule 25 - Cross Border Cost Allocation Tariff Provisions	NIA	NIA**	N/A	N/A	N/A	N/a*
Schedule 26 - Network Upgrade Charge from Transmission Expansion Plan	Buyer	Buyer**	Buyer	Buyer	Buyer	N/a*

* Information not explicitly defined in contract

** Ameren whiteness Haro stated in his deposition that AEP is the same as Wabash Power Association with regard to RTO/transmission charges