Exhibit No.: 700
Issue: Rate Design
Witness: Richard E. Stinneford
Sponsoring Party: Charter Communications, Inc.
Case No.: Case No. ER-2010-0036

CHARTER COMMUNICATIONS, INC.

Case No. ER-2010-0036

DIRECT TESTIMONY

OF

RICHARD E. STINNEFORD

Bethesda, Maryland
January, 2010

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, d/b/a AmerenUE's Tariffs to Increase its Annual Revenues for Electric Service	)))	Case No. ER-2010-0036

AFFIDAVIT OF RICHARD E. STINNEFORD

STATE OF MARYLAND)
) ss.
COUNTY OF _____)

I, Richard E. Stinneford, of lawful age, and being duly sworn, do hereby depose and state:

1. My name is Richard E. Stinneford. I am presently a consultant with Cablesave, llc.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

_____
Richard E. Stinneford

Subscribed and sworn to before me, a Notary Public, this 6th day of January, 2010.

_____
Notary Public

My Commission expires:

_____

DIRECT TESTIMONY OF RICHARD E. STINNEFORD

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Richard E. Stinneford. My business address is 5313 Portsmouth Rd., Bethesda, MD 200816.

Q. What is your occupation and by whom are you employed?

A. I am a Member of Cablesave, llc. I provide a variety consulting services to clients relating to regulatory issues in the electric and gas industries.

Q. Please describe briefly the nature of the consulting services provided by Cablesave, llc.

A. Cablesave, LLC is an energy consulting company created to assist cable television operators with managing energy expenses. Among other assistance that we provide, we review how cable operators are billed by electric utilities under various rate schedules and work with cable operators to obtain rates for electric service more in-line with the costs utilities incur to serve the various types of cable loads. Current clients include the members of the Virginia Cable Telecommunications Association ("VCTA"), Comcast Communications, Inc. ("Comcast") and Charter Communications, Inc. ("Charter"). Either directly or indirectly through the VCTA, we are currently working for three of the four largest cable Multiple System Operators ("MSOs") in the country: Comcast, Charter and Cox Communications, Inc.

Q. Please state your educational background.

A. I hold a BA from Bucknell University where I majored in both Mathematics and Economics. I also received an MA in Economics from the State University of New York at Binghamton (now known as Binghamton University).

Q. Please describe your professional experience.

A. I have been a consultant in the electric and gas utility industries for 30 years. In addition to being a member of Cablesave, LLC, I am also a member in the Washington Utility Group, LLC, another energy consulting firm. Previously, I worked for the utility consulting practice of Ernst & Young (formerly Ernst & Whinney). Most relevant to this proceeding, one of my areas of expertise is utility costing and ratemaking. I have provided testimony before U.S. courts, the Federal Energy Regulatory Commission, and a number of state utility regulators. My detailed resume including a list of my specific regulatory appearances can be found in Exhibit RES-1.

Q. On whose behalf are you testifying in this proceeding?

A. I am testifying on behalf of Charter Communications, Inc. ("Charter"). Charter provides a variety of communications services across much of the service territory of AmerenUE ("the Company).

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to propose modified billing mechanisms that would apply to cable television power supplies currently being served under the Company's Service Classification No. 2(M), Small General Service Rate ("Small GS"). Currently, constant use loads such as cable television power supplies are charged well in excess of the costs incurred by the Company to serve them.

Q. Please summarize your testimony.

A. Because of their very high load factors and the fact that they are unmetered, cable television power supplies are currently charged in excess of the Company's cost to serve because the Small GS rate is designed around a class that is characterized by a much lower load factor and for customers who are overwhelmingly metered. By allowing cable power supplies a reduction off the monthly customer charge as the Company does for other unmetered customers and by allowing power supplies to take advantage of the Optional Time-of-Day Rate contained within the Small GS tariff, Charter would save over $500,000 at proposed rates.

Charter has discussed this proposal with the Company, and to the best of our understanding, it has no objections to its implementation.

III. IDENTIFICATION OF EXHIBITS

Q. Do you sponsor any exhibits in support of your testimony?

A. Yes, I sponsor eight exhibits with this testimony. Exhibit RES-1 is my professional resume. Exhibit RES-2 calculates the difference in electric charges to Charter between the proposed Service Classification No. 2(M), the tariff schedule under which power supplies are currently billed, and a modified Service Classification No. 2(M) that I discuss below.

IV. CABLE POWER SUPPLIES, CLASS LOAD PATTERNS AND TARIFF IMPLICATIONS

Q. Please explain the function of cable television power supplies and the nature of describe the nature of their loads.

A. Cable television power supplies are devices that provide electricity to all of the components within and along an integrated cable television network. These devices are each interconnected with the local electric distribution system, most mounted on the utility's poles, but in some cases can be in separate units that sit on the curbside. Except for outages, all connected cable power supplies operate around the clock, every day of the year. These devices run at very high load factors, approaching 100%, except for outages. While actual loads vary with the type of device and how they are configured, the majority of power supplies have smaller than 1 kW demands. Except for the larger curbside installations, power supplies almost always use less than 1,000 kWh per month. Even though the load at any particular location is relatively small, the load across an entire integrated cable television system can be significant. For example, in the Company's service territory, I estimate that Charter power supplies

place approximately 2.6 MW of instantaneous demand on the Company's distribution system. In most ways, cable power supplies are thus ideal loads for an electric system. Not only are they very high load factor, but the load is distributed across the entire distribution system, and not concentrated at one or two locations.

Q. What evidence is there that power supplies operate at a very high load factor?

A. Both to provide the best picture signal quality and for economic reasons, power supplies must operate at a nearly constant level. The Company and numerous other utilities across the country implicitly or explicitly acknowledge this point since they do not meter power supply locations. The Company's Illinois affiliates have recently agreed to assign a flat, i.e. 100% load factor, load profile to Charter's power supplies in their service territories for shopping purposes. Elsewhere, Duquesne Light, Pepco and Delmarva Power that have stand alone tariffs for power supplies and do not meter them. All assume 100% load factors for cost allocation and rate design purposes. Another utility, JCPL, meters power supplies but nonetheless has assumed they operate at a 100% load factor by assigning them a perfectly flat load profile for shopping purposes in New Jersey. Yet another utility, PECO, also recognizes the constant use nature of power supplies. While PECO has no separate tariff, the great majority of power supplies in PECO's service territory are unmetered and are assumed to operate at a constant use when assigning minimum demands for billing purposes.

Q. How does the Company bill cable providers for power supply loads?

A. As I noted earlier in my testimony, cable television power supplies, because of their relatively small monthly loads, are billed under the Company's Classification No. 2(M), Small General Service Rate, the only rate for which they currently qualify.

Q. As proposed, is this an appropriate tariff for power supplies?

A. No. The standard charges contained in the Small GS rate are inappropriate for power supplies because they do not take into account that (1) power supplies are unmetered and thus they should not be assigned any meter-related costs and (2) the load pattern of the typical customer served under this schedule is dramatically different than the load pattern of power supplies. The Small GS class as a whole is a relatively low load factor class.

V. PROPOSED MODIFICATIONS

Q. Does the Small GS class have any provisions that would allow its members to take advantage of higher load factors?

A. Yes, there is an optional time-of-day option that provides some higher load factor customers to recover at least some of the lower costs associated with their better load shapes. Unfortunately, to take advantage of that option, a time-of-use meter must be installed at those customers' locations. Since power supplies are unmetered, they cannot take advantage of that option.

Q. Is there a readily available solution to this problem?

A. Yes. Power supplies are unmetered in the first place because they operate at a nearly constant use. Therefore, one can predict the number of kWh that will fall into each of the time of use billing periods by calculating the number of hours in each of the time of use billing periods and assign the monthly billing kWh to each period on the basis of the ratio of those hours to the total hours in the month. Thus, for example, if 65% of summer hours fall into the Off Peak period, then 65% of the billed kWh in a summer month in a particular location can be assumed to fall in that billing period. This allows constant use customers to avail themselves of at least some of the benefit of their high load factor without the need to incur the extra expenses of installing time of use meters at every location. I therefore propose that the energy rates charged to cable television power supply locations be set at the energy rates that this Commission ultimately approves for the optional time-of-day rates contained in Service Classification No. 2(M).

Q. What changes do you propose for the Small GS rate customer charge?

A. Because cable television power supplies are unmetered, there is no meter investment at those locations and there is no associated meter reading expense. I therefore propose a reduced customer charge be enacted for cable television power supplies.

Q. Is there precedent for such a reduction for other unmetered loads?

A. Yes. The Company currently has a $5.17 monthly customer charge for unmetered lighting uses in its Service Classification No. 6(M), Street and Outdoor Lighting – Customer-Owned. The Company has set this charge at $6.10 in its proposed tariffs. I propose that the monthly customer charge for cable television power supplies be set at

the same amount as the Commission approves in this case for Service Classification No. 6(M).

Q. You noted earlier that Charter had discussed these proposals with the Company. Please elaborate.

A. In early August of 2009, I contacted the Company to discuss Charter's concerns about the level of charges and to explore various remedies for Charter's power supply locations including, but not limited to, a new stand-alone tariff for power supplies. There were a number of subsequent phone and email contacts in which the general framework of a possible solution emerged. On October 15, 2009, I received an email from Mr. Wil Cooper at the Company, who indicated that an agreement along the lines I have presented above would be acceptable to the Company, that is, that cable television power supplies would be assigned the approved monthly customer charge for Service Classification No. 6(M) and the option of either the standard energy charges or the Optional Time-of-Day energy charges of Service Classification No. 2(M). After talking with representatives at Charter, they also agreed that it was acceptable and I communicated that fact to Mr. Cooper.

Q. Is the process you describe representative of how power supply rate design proposals are sometimes adopted by parties in the context of rate proceedings?

A. Yes. In my experience it is often the case that the utility and the customer agree to a proposal such as I have outlined after informal discussions and exchange of written materials and emails. It is my understanding that there is still an opportunity in this case

for parties to reach agreements that they can present to Staff and other parties before the Commission is required to render a final decision on the Company's going-forward rate design. Thus, I am comfortable in relying on the discussions between the Company and Charter as a basis for presenting the solution described above, and the discussions are the type of information upon which I would normally rely in formulating testimony such as this.

Q. Have the Company and Charter formally agreed to the proposal you have described?

A. No. It is my hope that a formal agreement can be reached in a timely fashion and presented to the Commission. Alternatively, presuming the Company still agrees with my proposal, it may simply confirm its agreement in its surrebuttal testimony. In either case, it is Charter's hope that the solution I have described will be treated as a non-controversial change to the Company's proposed rate design, and ultimately be approved by the Commission.

Q. What is the result of your proposed modifications?

A. Exhibit RES-2 shows the estimated difference in annual charges to Charter power supplies of billing them under Service Classification No. 2(M) as proposed in the Company's filing and with the modifications I have discussed above. Pages 1 and 2 of this exhibit show the savings for a typical power supply for a summer month and a winter month. These savings are then multiplied by the number of Charter power supplies to arrive at aggregate monthly savings. Total summer and winter savings

roll-up to page 1 and total $536,782. The savings calculation is approximate as I have made some simplifying assumptions with respect to the average local sales taxes and municipal charges.

The energy charges shown on pages 1 and 2 for the time of day option weighted averages calculated on page 3 based on the Company's proposed charges and my estimate of the number of annual hours falling into each period.

Q. Does this conclude your direct testimony?

A. Yes, it does.

Exhibit RES-1

RICHARD E. STINNEFORD

Mr. Stinneford, a Member of Cablesave, LLC, has 30 years of experience with a broad range of issues in the electric and gas utility industries, including pricing and rates, resource and integrated planning, valuation, prudence and contract reviews, and utility restructuring, among others. He has testified as an expert witness numerous times before U.S. courts, the Federal Energy Regulatory Commission, state regulatory authorities and arbitrators on a variety of issues. He has appeared before utility commissions in Texas, Maine, Delaware, Maryland, New Hampshire, Virginia, New Mexico, Indiana, Iowa, Louisiana, and Arkansas. He is also a Member of the Washington Utility Group, LLC. Before the forming of Cablesave, LLC and the Washington Utility Group, LLC, Mr. Stinneford was a long-term member of Ernst & Young's former utility consulting practice.

EXPERIENCE

Electric System Planning and Operations

On behalf of a variety of clients, Mr. Stinneford has conducted numerous electric planning and operations analyses including load forecasting, power pooling, production costing/system dispatch reviews, capacity planning studies, capacity bidding programs and reliability studies.

- **Nevada Power** — The development of a competitive bidding process and RFP for new generation resources.
- **Texas Public Service Commission** — Performance of a detailed review of the system planning process of Houston Lighting & Power Company (HL&P).
- **Arizona Corporation Commission** — Direction of a detailed review of system planning as part of a comprehensive review of the Palo Verde Nuclear Generating Station project.
- **Sierra Pacific Power Company** — Performance of a system planning and load forecasting review in support of rate base treatment for a new generating unit.
- **Sunflower Electric Cooperative, Inc.** — Evaluation of the economics of a long-term firm energy and capacity sale to a non-associated utility.
- **Texas-New Mexico Power Company** — Assistance to TNP in rate filings before the Texas Public Service Commission in support of rate recovery for TNP Units 1 and 2. Specific responsibilities included life-cycle costing analysis of the units versus alternatives at

several periods during the planning and construction of those units.

- **World Bank** -- Management audit of the Trinidad and Tobago Electricity Commission. Specific responsibilities included the review of T&TEC's system planning processes as well as reliability, production costing, and financial evaluation models.

- **New Mexico Public Service Commission** — Performance of a detailed system planning prudence review associated with the Public Service Company of New Mexico's (PNM) participation in the Palo Verde Nuclear Generating Station.

- **Four States Monitoring Committee** — Performance of a transmission study to assess the ability of the owners of the Palo Verde Nuclear Generating Station to market excess power and energy around the region.

- **Centerior Energy** — Performance of a system reliability study to assess the need for capacity of the Centerior system. The study was performed to determine appropriate rate making treatment for a new generating unit.

- **Metro-North Commuter Railroad** — Analysis of Metro-North's electric requirements and the identification of its power supply alternatives.

- **National Coal Association** — Evaluation of the relative economics of fluidized bed coal-fired generation relative to the proposed purchase of power by Central Maine Power from Hydro-Quebec. The analysis compared the likely life-cycle cost of the two alternative sources of base-load power.

Natural Gas Planning and Operations

Mr. Stinneford has also conducted analyses of LDC and pipeline contracting and gas dispatch procedures. He also has assisted gas utilities with the design and evaluation of gas DSM and conservation programs and their inclusion into integrated resource planning.

- **Washington Gas** — Evaluation of the energy impact of commercial/multi-family conservation programs on energy use as part of the least-cost planning process of Washington Gas.

- **Washington Gas** — Evaluation of the internal consistency of the various components of the Washington Least Cost Plan.

- **Tri-State Customer Alliance** — Analysis of the prudence of the gas supply planning of Texas Eastern pipeline system and associated costs.

- **Baltimore Thermal Energy Corporation** — Analysis of the cost and benefit impact of the inclusion of two-stage, steam absorption chillers on the Baltimore Gas and Electric Company's gas cooling DSM program.

- **Midwest Energy** — Development of a gas supply strategy incorporating the impact of Order 436. The effort included the development of a gas supply model to determine the optimal supply mix taking into account both costs and risks.

- **Texas Utilities** — Performance of a management audit of the Texas Utilities Fuel Company. Included in the audit are the gas acquisition, supply planning, gas dispatching, and operations functions of the Company.

- **New Jersey Board of Public Utilities**— Performance of a comprehensive management audit of New Jersey Natural Gas. Specific responsibilities include the review of the gas supply, system planning, and gas dispatching functions of the utility.

- **Public Utilities Commission of Ohio** — Evaluation of the gas purchasing practices and policies of Dayton Power & Light Company.

- **Connecticut Natural Gas** — Analysis of the factors influencing decreasing natural gas use per customer for over 30 separate rate codes.

Costing and Rates

Mr. Stinneford has extensive experience in the areas of traditional and innovative cost of service and rate design for electric and gas utilities. He has conducted both embedded and marginal cost of service studies and has designed both cost-based and market-based rates.

? **Western Resources** — Performance of a fully allocated, embedded cost of service study for Western's Kansas jurisdictions.

? **Central Montana Power Cooperative and Big Horn County Electric Cooperative** — Calculation of the stranded costs of Northwestern Energy attributable to Central's and Big Horn's wholesale contracts.

? **Dairyland Power Cooperative** — Designed new wholesale tariffs

to reflect changes in this Wisconsin utility's operating environment and in the market.

? **United Cities Gas** — Performance of a fully allocated, embedded cost of service study for United Cities' Iowa jurisdiction.

• **Washington Gas** — Evaluation of the relationship between the proposed cost allocations and rate designs of Virginia Power Company and its embedded costs.

? **South Florida Cogeneration Associates** — Development of the cost of service to jurisdictional and non-jurisdictional customers.

• **Time Differentiated Accounting Cost Studies and Short Run Marginal Cost Studies** — For a number of different clients, the analysis of a utility's time differentiated embedded costs and/or short run marginal costs for purposes of class cost allocation and rate design. These efforts required performing simulated redispatches of the utility's generation system. The utilities on which analyses were performed include:

-- Arkansas Power & Light Company
-- Indianapolis Power & Light Company
-- Central Maine Power Company
-- Montana Power Company
-- Empire District Electric Company
-- Northern Indiana Public Service Company
-- Public Service of Indiana
-- Arizona Public Service Company
-- Missouri Public Service Company (Utilicorp)
-- Southern Indiana Public Service Company
-- Tucson Electric Company
-- City of Richmond, Ind.
-- Southwestern Electric Power Company.

• **Empire District Electric Company** — Performance of a fully allocated traditional cost-of-service study as well as a fully allocated embedded time-of-use cost study for the Company's Missouri jurisdiction.

• **Indianapolis Power & Light Company** — Performance of a fully allocated class cost-of-service study for the Company's Indiana jurisdiction.

• **Industrial Energy Consumer Group** — Performance of a fully allocated time differentiated cost-of-service study and rate design in a Central Maine Power Company rate case.

- **Washington Gas** -- Analysis of the rate filing of the Potomac Electric Power Company (PEPCO) before the District of Columbia Public Service Commission. Specific issues of analysis included PEPCO's calculation of marginal costs, its reconciliation methods, its assignment of costs to seasons, its selection of appropriate rating periods, and the cost basis of its retail rate design, particularly its proposed tailblock rates.

- **Washington Gas** — Analysis of two separate retail rate filings of the Potomac Electric Power Company (PEPCO) before the Maryland Public Service Commission (Docket Numbers 8251 and 8315). Issues included PEPCO's calculation of marginal costs, its assignment of costs to seasons, its selection of appropriate rating periods, and the cost basis of its retail rate design.

Litigation

A substantial portion of Mr. Stinneford's experience is related to support of clients involved in civil litigation. His litigation experience includes the following engagements:

? **Consolidation Coal Company** — Assistance in a coal supply contract dispute before the U.S. District Court. Support included an analysis of the plaintiff's operating costs and efficiency within the plaintiff's geographic market area.

? **Hydro-Quebec** — Assistance in a power supply contract dispute before the American Arbitration Association. Support included the repricing of deliveries of power consistent with the plaintiff's interpretation of the contract provisions.

? **Conoco** — Evaluation of the damages associated with alleged overcharges of intrastate gas sold by Conoco and re-sold to customers of a retail gas utility in the State of New Mexico.

? **Cajun Electric Power Cooperative** — Assistance to this cooperative utility in litigation concerning Cajun's minority interest in the River Bend nuclear generating station. Support included the calculation of damages associated with the contract between Cajun and Gulf States Utilities (now an operating company of Entergy).

? **Unocal Geothermal Division and Pacific Gas & Electric Company** — Evaluation and documentation of the operating procedures followed by Pacific Gas & Electric Company during times of excess hydro power availability. The independent review resulted from litigation stemming from a contractual dispute between Unocal and PG&E.

? **Vinson & Elkins** — Assistance in a large litigation for an engineering and construction firm involved in the design and construction of a nuclear power facility. The engagement involved an assessment of the ability of the owners of the plant to finance its construction on a timely basis.

? **City of Lakeland** — Assistance to a municipal utility in Florida involved in litigation associated with the performance of a number of operating systems at an electric power plant. The assistance included the calculation of damages consisting of direct cost of replacement, increased cost of replacement power, and lost revenues from existing power contracts.

? **Shutts & Bowen** — Assistance with the calculation of alleged damages associated with the failure of a steam turbine unit at an electric power generating plant. The engagement consisted of a critical review of the plaintiff's claim and the preparation of alternative analyses of direct and consequential damages, including the cost of replacement power.

Other Relevant Experience

Mr. Stinneford has experience in a number of other utility areas including electric utility restructuring, mergers, business valuations and independent power, among others.

? **City of New Orleans** — Mr. Stinneford has been a long-term advisor to the City Council's Regulatory Office that serves as the retail regulator of Entergy New Orleans. His specific responsibilities are the evaluation of the financial performance and reporting of Entergy New Orleans, Entergy Corporation and Entergy Corporation's various other subsidiaries, particularly its unregulated businesses. He is also responsible for monitoring Entergy's compliance with the Public Utility Holding Company Act as well as for monitoring the effect of SEC policies and federal legislation on Entergy.

? **New Hampshire Governor's Office** — Assistance in restructuring proceedings involving jurisdictional utilities in the state. We represented the Governor's Office in negotiating settlement agreements with Granite State Electric, a subsidiary of the New England Electric System, and Public Service of New Hampshire, a subsidiary of Northeast Utilities, both multi-state, registered holding companies.

? **Valuation Studies** — Mr. Stinneford has performed a number of financial evaluations and valuation studies for a variety of clients. Most of these were related to the potential acquisition of both additional utility and non-utility assets.

TESTIMONY

- Indiana Public Service Commission, Cause #35780-S4, for the IPSC staff on the time differentiated accounting costs of Indianapolis Power & Light Company, March 1981.
- Indiana Public Service Commission, Cause #35780-S5, for the IPSC staff on the time differentiated accounting costs of the Southern Indiana Gas and Electric Company, April 1981.
- Indiana Public Service Commission, Cause #35780-S6, for the IPSC staff on the time differentiated accounting costs of Richmond Power & Light, May 1981.
- Arkansas Public Service Commission, Docket #82-314-U, for Arkansas Power & Light on time differential accounting costs, 1983.
- Louisiana Public Service Commission, Docket Nos. U-16038, U-16039, and U-16207, for Applied Energy Services on the avoided costs of Gulf States Utilities, August 1984 (rebuttal testimony November 1984).
- Maine Public Utilities Commission, Docket #86-2, for the Industrial Energy Consumer Group on cost-of-service and rate design of Central Maine Power Company, July 1986.
- New Mexico Public Service Commission, Case #2087, for the NMPSC staff on the system planning prudence of Public Service of New Mexico, July 1989.
- Public Utilities Commission of Texas, Docket #6667, for the PUCT staff on the system planning prudence of the Houston Lighting and Power Company, June 1989.
- Public Utilities Commission of Texas, Docket #6992, for Texas-New Mexico Power Company on the life cycle costs of TNP One, April 1990.

- Public Utilities Commission of Texas, Docket #9491, for Texas-New Mexico Power Company on the prudence of TNP's decision to construct TNP One, August 1990.

- State Corporation Commission of Virginia, Case No. PUE920041, for Washington Gas on the application of Virginia Power Company for an increase in rates, February 16, 1993.

- Public Utilities Commission of Texas, Docket #10832, for Destec Energy, Inc. on the standard avoided cost calculation for the purchase of firm energy and capacity of the Houston Lighting & Power Company, August 11, 1993.

- Public Service Commission of Maryland, Case No. 8564, for Baltimore Thermal Energy Corporation on the commercial gas air-conditioning program of the Baltimore Gas and Electric Company, December 21, 1993.

? American Arbitration Association, for Hydro-Quebec, on a dispute on the correct calculation of pricing provisions in a power supply contract, June 1997.

? United States District Court, Eastern District of Missouri, Eastern Division, No. 4:96CV01881JCH, for Consolidation Coal Company relating to a coal supply contract between Consolidation and Union Electric, February 27, 1998

? New Hampshire Public Utilities Commission, Docket No. DR 98-012, for the Governor's Office of Energy and Community Services on the restructuring of Granite State Electric, an operating subsidiary of the New England Electric System, March and May 1998.

? Federal Energy Regulatory Commission, Docket No. SC00-1-001, for Central Montana Power Electric Cooperative, Inc. and Big Horn County Electric Cooperative, Inc. on the stranded costs of Northwestern Energy, LLC attributable to Central and Big Horn, July 2, 2002.

? Public Service Commission of the State of Delaware, Docket No. 05-304, for Comcast Cable Communications, Inc. on cost of service and rate design applicable to cable television power supplies in the Delmarva Power, Inc. Delaware service territory, December 9, 2005.

? Public Service Commission of Maryland, Docket No. 9093, on behalf of Comcast Cable Communications, Inc. on cost of service

and rate design applicable to cable television power supplies in the Delmarva Power, Inc. Maryland service territory, March 5, 2007.

EDUCATION

Mr. Stinneford holds an M.A. in applied economics from the Binghamton University, where he specialized in mathematical economics and econometrics. He also holds and an A.B. (summa cum laude) in mathematics and economics from Bucknell University.

Difference in Electric Cost of Power Supplies
Service Classification No. 2(M)
As Proposed by Company vs. With Modifications

Exhibit RES-2

	Avg. Monthly kWh =		320		320
	2(M) SGS As Proposed by Company			**2(M) SGS with TOD Energy Charges and 6(M) Customer Charge**	
Customer Charge	11.00	$	11.00	6.10	$ 6.10
Energy Charge	0.0959	$	30.69	0.0870	$ 27.83
Total Ameren Charges		$	41.69		$ 33.93
MO State Sales Tax		$	1.76		$ 1.44
Average Local Sales Tax		$	1.25		$ 1.02
Average Municipal Charge		$	2.00		$ 2.00
Total Invoice		$	46.70		$ 38.38
Monthly Savings per Suppy					$ 8.32
Number of MO Power Supplies					5,054
Total Summer Month Savings					$ 42,066
Total Annual Savings					**$ 536,782**

Difference in Electric Cost of Power Supplies
Service Classification No. 2(M)
As Proposed by Company vs. With Modifications

Exhibit RES-2

Avg. Monthly kWh =		320.0			320.0
	2(M) SGS As Proposed by Company			**2(M) SGS with TOD Energy Charges and 6(M) Customer Charge**	
Customer Charge	11.00	$	11.00	6.10	$ 6.10
Energy Charge	0.0715	$	22.88	0.0605	$ 19.37
Total Ameren Charges		$	33.88		$ 25.47
MO State Sales Tax		$	1.43		$ 1.08
Average Local Sales Tax		$	1.39		$ 1.04
Average Municipal Charge		$	2.00		$ 2.00
Total Invoice		$	38.70		$ 29.59
Monthly Savings per Puppy					$ 9.11
Number of MO Power Supplies					5,054
Total Winter Month Savings					$ 46,065

Time of Use Option Energy Charges at Proposed Rates
Service Classification No. 2(M)

Exhibit RES-2

	Energy Rates	Avg. # of Monthly Hours
Summer		
On-Peak	$ 0.1423	252
Off-Peak	$ 0.0579	480
Winter		
On-Peak	$ 0.0936	256
Off-Peak	$ 0.0430	473
Avg. Summer Energy Rate	$ 0.0870	
Avg. Winter Energy Rate	$ 0.0605	