Ameren Missouri - Staff-016 Filed October 22, 2012 Data Center Missouri Public Service Commission

Data Information Request From Union Electric Company d/b/a Ameren Missouri MPSC Case No. ER-2012-0166

Requested From: Staff of the Commission

Requested By: Jim Lowery

Date of Request: July 19, 2012

Information Requested:

With regard to Staff's proposed adjustment to Rate Case Expenses as set out at page 110 of the July 6, 2012 Staff Report, please provide any analysis (with any of the underlying documents or information relied upon by Staff) of "other large utilities" in Missouri to process recent rate cases.

Response:

In response to Ameren Missouri's data request 016, regarding Staff's Cost of Service Report dated July 6, 2012, Staff's analysis of "other large utilities" was based upon data received in response to an informal data request as part of AW-2011-0330. Staff viewed the amount of rate case expense required to complete various rate cases in the past few years. This review was to gain knowledge of what costs other large utilities incur for rate case expense in order to access if Ameren Missouri were incurring costs which were unusual as comparable to what other utilities typically incur. The review was used as part of a reasonableness check by Staff.

Staff performed no further analysis regarding "other large utilities". Staff's adjustment in this case is by and large reliant upon previous Ameren Missouri data and circumstances.

Given that the data provided by the other utilities is confidential, and was not filed as part of a public record in the above mentioned case, the actual amounts of rate case expense per company cannot be disclosed by Staff. However, Staff can provide a list of the companies it reviewed. Staff's review was limited to Empire District Electric Company, Kansas City Power and Light (KCP&L) and KCP&L - Greater Missouri Operations Company.

The attached information provided to Missouri Industrial Energy Consumers in response to the above Data Information Request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform Missouri Industrial Energy Consumers if, during the pendency of Case No. ER-2012-0166 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

Date 10-1 Exhibit No. 2 Date 10-1 Reporter File No. E. 2002-

If these data are voluminous, please (1) identify the relevant documents and their location; (2) make arrangements with requestor to have documents available for inspection at a location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this Data Request, the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to the person identified in the "Requested From" block above and all other employees, contractors, agents or others employed by or acting on behalf of the organization, group or governmental unit associated with that person. When used with respect to a natural person, "identify" means state his or her name, address, telephone number, current employer, job title, and current work telephone number.

Response Provided By: Lisa Hanneken Date: 7/30/12