

Ameren's Response to  
State of MO - Atty General Data Request  
MPSC Case No. ER-2007-0002  
AmerenUE's Tariff Filing to Increase Rates for Electric Service  
Provided to Customers in the Company's Missouri Service Area

FILED<sup>3</sup>

APR 25 2007

Missouri Public  
Service Commission

Requested From: Mike Brosch

Data Request No. AG/UTI-332

Ref: Rebuttal Testimony of AmerenUE witness Mr. Moehn, page 4 (Joppa Plant Risks) At page 4 of his Rebuttal, Mr. Moehn states, "if the Joppa Plant had experienced some type of catastrophic failure, had regulation made a coal plant undesirable, or had other equally bad and unforeseen events happened at EEInc, AmerenUE would not have sought recovery from ratepayers because AmerenUE's shareholders were at risk for this unregulated investment."

Please provide the following information:

- a. State whether AmerenUE or any affiliated Company has ever made a representation of the type quoted above in any filing or pleading made before the Missouri PSC or any other regulatory agency.
- b. If your response to part (a) is affirmative, provide complete copies of all documents associated with or supportive of your response.
- c. State whether the Joppa Plant has ever "experienced some type of catastrophic failure" and explain each such event.
- d. State whether any other "equally bad and unforeseen events" have ever happened at EEInc. and explain each such event.
- e. Explain all facts and other information relied upon by Mr. Moehn to conclude that, "Ameren UE would not have sought recovery from ratepayers of increased costs "if catastrophic failures or other "bad and unforeseen events" had occurred at Joppa.
- f. Provide complete copies of all documents associated with your response to part (e) of this data request.

Response:

AmerenUE has always treated the investment in EEInc. as a below-the-line investment. It has never behaved inconsistently with that treatment. Similarly, the Missouri Public Service Commission has never treated the investment in EEInc. as an above-the-line investment of AmerenUE. AmerenUE has never had the occasion to make the specific statement set out in this data request. Under the traditional, well-established understanding of a below-the-line investment like AmerenUE's investment in EEInc., all risks associated with that investment were borne by AmerenUE's shareholders, including the risks associated with "catastrophic failures" or other "bad and unforeseen events" that may have been visited upon EEInc. Mr. Moehn is unaware of any "catastrophic failure" or "equally bad and unforeseen events" that have ever occurred at EEInc.

State Exhibit No. 515  
Case No(s) ER-2007-0002  
Date 3/20/07 Rptr NV

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Title: Managing Supervisor, Strategic Planning

Date: February 16, 2007