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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2008-0318

DIRECT TESTIMONY

OF

WILBON L. COOPER

ON

BEHALF OF

UNION ELECTRIC COMPANY
d/b/a AmerenUE

St. Louis, Missouri
April, 2008

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DIRECT TESTIMONY

OF

WILBON L. COOPER

CASE NO. ER-2008-____

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Wilbon L. Cooper. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and in what capacity?

A. I am employed by Union Electric Company d/b/a AmerenUE ("AmerenUE" or the "Company") as the Manager of the Rate Engineering and Analysis Department.

Q. Please describe your educational background and employment experience.

A. My educational background consists of a Bachelor of Science degree in Electrical Engineering from the University of Missouri-Rolla.

I was employed as an Assistant Engineer in the Rate Engineering Department of Union Electric in June 1980. My work included assignments relating to the general analyses and administration of various aspects of Union Electric's electric, gas, and steam rates. In October 1989, I was appointed Supervising Engineer – Rate Analysis, in the Rate Engineering Department of Corporate Planning at Ameren Services Company. In this position, I was responsible for meeting the analytical requirements for the Company's retail gas and electric rates and wholesale electric rates, including load research and various cost of

service and rate design studies, as assigned. I was appointed to my present position of Manager of Rate Engineering and Analysis in March 2003.

I currently have responsibility for the general policies and practices associated with the day-to-day administration and design of AmerenUE's electric and gas rate tariffs, riders and rules and regulations tariffs on file with the Missouri Public Service Commission ("Commission") and in the participation in various proceedings before this regulatory agency. In addition, Rate Engineering is responsible for conducting class cost of service and rate design studies and the participation in other projects of a general corporate nature, as requested by the Vice President Regulatory Affairs.

I have previously submitted testimony before the regulatory commissions of Missouri, Illinois, and Iowa.

II. PURPOSE AND SUMMARY OF TESTIMONY

Q. What is the purpose of your direct testimony in this proceeding?

A. My direct testimony discusses: a) the revenue increase being proposed for the Company's electric retail rate classes; b) the development and results of a class cost of service study being submitted in connection with the direct testimony of AmerenUE witness William M. Warwick as part of this case; c) the design and development of the individual class rates; and d) miscellaneous tariff revisions filed as part of this case. I have summarized my testimony and the testimony of Mr. Warwick and AmerenUE witness James R. Pozzo in Attachment A attached hereto.

Q. Have you prepared or have there been prepared under your direction and supervision a series of schedules for presentation to the Commission in this proceeding?

A. Yes. In addition to Attachment A mentioned above, I have prepared eight schedules. The first three, discussed immediately below, provide a summary of the rate increase requested in this case. I discuss the remaining schedules throughout my direct testimony.

Q. Please identify Schedule WLC-E1.

A. Schedule WLC-E1 consists of twenty-three (23) tariff sheets, which reflect the revised rates and miscellaneous tariff revisions being proposed by the Company for approval by the Commission in this proceeding. These tariffs, taken as a whole, would provide an increase in the Company's net Missouri jurisdictional normalized test year revenue of approximately $250.8 million, or 12.1%, over the annualized test year (12 months ending March 30, 2008, as adjusted for customer growth through June 2008) revenue realized from the tariffs which are effective at the time of filing. It should be noted that AmerenUE witness Martin J. Lyons, Jr. is sponsoring the Company's proposed Rider A - Fuel Adjustment Rider ("FAC") tariffs in this case.

Q. Please identify Schedule WLC-E2.

A. Schedule WLC-E2 shows the distribution of the proposed net revenue increase to the Company's various proposed rate service classifications, resulting from the proposed tariffs in Schedule WLC-E1, excluding gross receipts taxes levied on customer billings by the various municipalities within the Company's service area.

Q. Please identify Schedule WLC-E3.

A. Schedule WLC-E3 illustrates the effects of the proposed rates in Schedule WLC-E1 upon typical monthly bills of customers served under the Company's non-lighting rate service classifications.

III. CLASS COST OF SERVICE STUDY

A. Class Cost of Service Concepts and Operating System Components

Q. Please explain what is meant by "class cost of service".

A. The Company currently provides service to its customers in a number of rate classifications that are designated for residential or non-residential service. The non-residential customer group is differentiated by customer size and the voltage level at which the Company provides service. The current customer classes are Residential, Small General Service ("SGS") and Large General Service ("LGS") (all of which have their service delivered at a low secondary voltage level); Small Primary Service ("SPS") and Large Primary Service ("LPS") (delivery at a high voltage level); Large Transmission Service ("LTS") (delivery at a "transmission" voltage level) and lighting service (both area and street lighting). A class cost of service study provides a basis for allocating and/or assigning the Company's total jurisdictional cost of providing electric service to these various customer classes in a manner that reflects cost causation. The results of a class cost of service study with equalized rates of return are often referred to as "class revenue requirements". Mr. Warwick conducted a class cost of service study for this case, under my supervision, and he is sponsoring that study in direct testimony filed in this proceeding.

Q. How are the results of a class cost of service study used by the Company?

A. These study results are typically used to develop the target level of annual revenue that the Company should recover from each customer class, through the application of the rates or charges within the Company tariffs under which the various customer classes are being served.

Q. Please explain your use of the term "rate design".

A. The term "rate design" refers both to the process of establishing the specific charges (e.g. monthly customer charges, dollars per kilowatt of demand and/or cents per kilowatt-hour energy charges) for each customer class, as well as to the actual structure of an individual class rate. The rate design, or structure, of a given class rate may range in complexity from a simple structure consisting of a monthly customer charge and a flat charge per kilowatt-hour (such as the Company's summer Residential rate), to a more complex set of customer, demand, energy and reactive charges (such as the Company's SPS, LPS and LTS rates). In all instances, however, the charges within a specific rate classification are established such that the application of these individual charges to the total annual customer class electrical usage will result in the collection of the targeted annual revenue requirement of each of the Company's retail rate classes.

Q. As background for additional discussion on the class cost of service study the Company is recommending in this case, please provide a general description of the various facilities utilized by the Company in producing and delivering electricity to its customers.

A. Schedule WLC-E4 of my testimony is a simplified diagram illustrative of the AmerenUE electric system, showing how power flows from the generating station and is then transmitted and distributed to the home of a residential customer. Other customers receiving service at higher voltage levels are also served from various points on the same system.

Q. Please describe, in more detail, how the Company's system operates.

A. As illustrated in Schedule WLC-E4, electrical power is produced at the Company's generating stations at voltage levels ranging from 11,000 to 23,750 volts. To

achieve transmission operating economies, this voltage is raised, or stepped up, by power transformers at the generating station sites to voltages generally ranging from 138,000 to 345,000 volts for transmission to the Company's bulk substations that are strategically located throughout its service area.

Q. What is the function of the Company's bulk substations?

A. Bulk substations receive electrical power at transmission voltage levels. They then lower, or step-down, this power to transmission or distribution voltages generally ranging from 138,000 volts to 34,500 or 69,000 volts. Such power is then distributed over the Company's 34,500 or 69,000 volt distribution lines to distribution substations located throughout the Company's service area.

Q. What function do distribution substations perform?

A. Distribution substations, which are far more numerous than bulk substations, provide a further reduction in the electrical power voltage to a range of 4,160 to 13,800 volts within various portions of the Company's service area. The power is then distributed over the Company's 4,160 to 13,800 volt distribution lines to points at or near the premises of the Company's customers.

Q. After electrical power at 4,160 to 13,800 volts is delivered to a point at or near a customer's premises, do any further reductions in voltage take place?

A. Yes, in most instances. While approximately 650 of the Company's largest industrial and commercial customers in Missouri take service at the 4,160 to 13,800 volt range or higher, the majority of the Company's customers are served at lower voltages, ranging from 120 to 480 volts. The lower voltages are achieved through the use of numerous line transformers located at or near the customer's premises. This low voltage electrical

power from the line transformer is delivered to a customer's premises over low voltage lines referred to as "secondary" and "service" lines.

Q. What voltages are utilized in providing electric service to residential customers?

A. Residential customers are served at either 120 or 240 volts depending upon the customer's service entrance panel size and connected appliances.

Q. What voltages are utilized to serve non-residential customers?

A. Non-residential customers on the Company's SGS and LGS rates are served at voltages from 120 to 480 volts due to the wide variety of electrical consuming devices utilized by such customers. Customers in the latter voltage range are often referred to as "secondary" voltage customers. Other larger non-residential customers receiving service at 4,160 to 13,800 volts are referred to as "primary" voltage customers. The Company also serves approximately 50 customers in Missouri at voltages above the 13,800 volt level. These are referred to as "high voltage" or Rider B customers. Additionally, the Company serves its only current LTS customer at 161 kilovolts ("kV") via a unique transmission service arrangement.

Q. In your description of the AmerenUE generation, transmission and distribution system are you using the term "lines" in a general sense?

A. Yes. Those "lines" may be overhead conductors or underground cables. Overhead "lines" include all poles, towers, insulators, crossarms and all other hardware associated with such installations. Underground "lines" include direct buried cable, as well as that installed in single or multi-duct conduit, and other associated hardware.

B. Costs and Revenues in Class Cost of Service Study

Q. Please describe the components of costs and revenues that are contained in the class cost of service study that the Company is recommending in this case.

A. A traditional cost of service study incorporates the aggregate jurisdictional (Missouri or Federal Energy Regulatory Commission ("FERC")) accounting and financial data normally submitted to a regulatory commission by a utility in support of a request for an adjustment in its overall rate levels. Such a study is required to determine the level of revenues necessary for the Company to recover its operating and maintenance expenses, depreciation applicable to its investment in utility plant, property taxes, income and other taxes, and provide a fair rate of return to the Company's investors, through its rates. The Company's class cost of service study allocates, or distributes, these total jurisdictional costs to the various customer classes in a cost based manner that fairly and equitably reflects the cost of the service being provided to each customer class.

Q. Was a Missouri jurisdictional cost of service study performed by the Company's Regulatory Accounting group the starting point for the class cost of service study performed and sponsored by Mr. Warwick?

A. Yes, it was. As I indicated above, the Company's class cost of service study is a continuation and refinement of the Missouri jurisdictional cost of service study discussed in the direct testimony of AmerenUE witness Gary S. Weiss, resulting in a determination of the costs incurred in providing electric service to each of the Company's customer classes.

Q. What categories of cost were examined in the development of the class cost of service study being sponsored by Mr. Warwick in this case?

A. A detailed analysis was made of all elements of the Company's Missouri jurisdictional rate base investment and expenses during the test year for the purpose of allocating such items to the Company's present customer classes. This analysis consisted of classifying the various elements of cost into their customer-related, energy-related and demand-related cost categories.

Q. Why are the Company's costs classified into these three categories?

A. It is generally accepted within the industry that each of these categories of cost is incurred by the Company as a result of different cost causation factors and, hence, should be allocated among the various customer classes by different methodologies which consider such cost causation.

Q. What are customer-related costs?

A. Customer-related costs are the minimum costs necessary to just make electric service available to the customer, regardless of the extent to which such service is utilized. Examples of such costs include monthly meter reading, billing, postage, customer accounting and customer service expenses, as well as a portion of the costs associated with the required investment in a meter, the service line, the transformer and other distribution facilities. The customer components of the distribution system are those costs necessary to simply make service available to a customer, without the consideration of the amount of the customer's electrical use. The January 1992 edition of the Electric Utility Cost Allocation Manual, published by the National Association of Regulatory Utility Commissioners ("NARUC"), references both customer-related and demand-related cost components for all distribution plant and operating expense accounts other than for substations and street lighting.

Q. What are energy-related costs?

A. Energy-related costs are those costs related directly to the customer's consumption of electrical energy (kilowatt-hours) and consist primarily of fuel, fuel handling, a portion of production plant maintenance expenses and the energy portion of net interchange power costs.

Q. What are demand-related costs, which are the third category of costs to which you referred?

A. Demand-related costs are rate base investment and related operating expenses associated with the facilities necessary to supply a customer's service requirements during periods of maximum, or peak, levels of power consumption each month. During such peak periods this usage is expressed in terms of the customer's maximum power consumption, commonly referred to as kilowatts of demand. As so defined, demand-related costs include those costs in excess of the aforementioned customer and energy-related costs. The major portion of demand-related costs consists of generation and transmission plant and the non-customer-related portion of distribution plant.

C. <u>Cost Allocations</u>

Q. After the Company's costs are categorized into one of these three classifications, how are they allocated to the various rate classes?

A. Customer-related costs are normally allocated on the basis of the number of customers associated with each rate class. In some instances involving non-residential customer multiple metering installations, weighting factors may also be used. In addition, where specific costs can be identified as being attributable to one or more specific customer

classes, such as credit and collection expenses, a direct assignment of such costs will be made.

Energy-related costs are allocated to the customer classes on the basis of their respective energy (kilowatt-hour) requirements at the generation level of the Company's system, which includes applicable system energy losses. The use of this common point on the Company's system to allocate such costs ensures that each customer class will be assigned the appropriate portion of the Company's total incurred variable fuel and purchased power costs.

Demand-related distribution costs are allocated to customer classes using one or more allocation factor based upon customer class coincident, class non-coincident or individual customer non-coincident kilowatt demands. Demand-related transmission costs were allocated to customer classes on a 12 coincident peak ("CP") basis, as that methodology is consistent with the method utilized to assign cost responsibility of the demands of the Ameren operating companies and all of the other utilities participating in the Midwest Independent Transmission System Operator, Inc. ("MISO"), per the MISO's filing at the FERC. Demand-related production costs are allocated on the basis of the Average & Excess ("A&E") Demand Method referenced in the NARUC cost allocation manual. As not all customers have demand meters, customer class and individual customer kilowatt demand data is obtained from the Company's ongoing load research program.

Q. As generation (production) plant consists of more than half of the Company's total plant investment, please summarize the most common cost allocation methodologies employed within the electric utility industry for the allocation of generation plant.

A. The most common and generally accepted methodologies used for the allocation of generation plant can be grouped into the following three categories:

Peak Responsibility – Costs are allocated on the basis of the relative customer class demands at the time of occurrence of the company's system peak during the period of study (referred to as the "coincident peak" or "CP" method). One or more system peak hours, or a number of monthly or seasonal system peaks, are normally used in applying the CP methodology.

Non-Coincident Peak – Costs are allocated on the basis of the maximum peak demand of each customer class at any time during the study period, without regard to the time of occurrence or magnitude of the company's coincident system peaks (referred to as the "NCP" method). As with the CP method, the NCP methodology can employ one or more customer class peaks in its application.

Average and Excess - Costs are allocated based upon a weighting of average class demand throughout the year (kilowatt-hours ÷ 8760 hours) and class "excess" demand(s) (referred to as the "A&E" method). The excess demand(s) used in this determination are the class NCP demand(s) in excess of the average class demand during the study period. As with the CP and NCP methodologies, this method can also employ the use of one or more customer class NCP demands to determine class excess demands. Average class demands are weighted by the Company's annual system load factor ("LF") (LF = average demand ÷ peak demand) and excess class demands are weighted by the complement of the load factor (1.0 – LF) in the development of cost allocation factors using this methodology.

Q. Which cost allocation methodology is the Company using for production plant in its class cost of service study in this case?

A. The Company is utilizing the 4 NCP version of the Average and Excess Demand methodology for allocating production plant in this case.

Q. What were the considerations associated with the Company's election to utilize the A&E allocation methodology for production plant in this case?

A. Two major factors associated with generation capacity planning prompted the use of the A&E cost allocation methodology. Generally, system peak demands and, to a somewhat lesser extent, excess customer demands, are the motivating factors which influence the amount of capacity the Company must add to its generation system to provide for its customers' maximum demands. However, the type of capacity (base, intermediate or peaking) which the Company must add is not dictated by maximum customer demand alone, but also by the annual energy, or kilowatt-hours, which will be required to be generated by such capacity, i.e., the generation unit's utilization factor. A cost allocation methodology that gives weight to both a) class peak demands and b) class energy consumption (average demands) is required to properly address both of the above considerations associated with capacity planning. The A&E methodology gives weight to both of these considerations by its inclusion of both average class demands, which are kilowatt-hours divided by total hours in the year (8,760) and the excess NCP demands of each class. As indicated earlier, the Company's A&E cost allocation study used both the 4 NCP and average class demands in the determination of class excess demands.

Q. Is there also quantitative support for the Company's selection of the 4 NCP version of the A&E demand allocation methodology for the allocation of production plant?

A. Yes. The 4 NCP version of the A&E methodology, which uses the four maximum non-coincident monthly peak demands for each customer class during the test year, was selected due to the fact that 15 of the 20 maximum 4 NCP monthly demands for the Company's major customer classes occurred during the Company's summer peak demand months of June - September. The use of the 4 NCP demand option, rather than a lesser number of monthly NCP demands, also prevents the demand allocator for any customer class from being unduly influenced by any extreme demand in a given month.

Q. After the determination of customer, energy and demand allocation factors for the various components of the Company's costs, what was the next step in the completion of the Company's class cost of service study?

A. The next step was to apply the allocation factors developed for each class to each component of rate base investment and each of the elements of expense specified in the jurisdictional cost of service study. The aggregation of such cost allocations indicates the total annual costs, or annual revenue requirement, at equalized rates of return associated with serving a particular customer class. The operating revenues of each customer class minus its total operating expenses provide the resulting net operating income for each class. This net operating income divided by the rate base allocated to each class will indicate the percentage rate of return being earned by the Company from a particular customer class. This application of allocation factors to Missouri jurisdictional costs, the aggregation of the total

annual cost to each of the customer classes and a summary of the results of the Company's class cost of service study are described in detail in Mr. Warwick's direct testimony.

D. Study Results

Q. Referring now to the results of the Company's class cost of service study performed by Mr. Warwick in this case, please identify Schedule WLC-E5.

A. Schedule WLC-E5 (also Mr. Warwick's Schedule WMW-E1) summarizes the results of the Company's class cost of service study, indicating the rate of return on rate base currently being earned on the service being provided to the Company's major retail customer class. As indicated earlier, the basic starting point for this study was the Missouri jurisdictional cost of service study.

Q. What general conclusions can be drawn from the information contained in Schedule WLC-E5?

A. The Residential and Large Primary Service classes are providing below average rates of return, while all other classes are providing above average rates of return. Overall, as is suggested by the filing of this case, the Company is earning an inadequate return on its rate base.

E. Class Revenue Proposals

Q. Please identify Schedule WLC-E6.

A. Schedule WLC-E6 summarizes the class revenue requirements necessary to give the Company an opportunity, based upon test year figures, to achieve an equal rate of return from its customer classes. This information was developed from the cost of service data contained in Schedules WMW-E1 and WMW-E2 of Mr. Warwick's direct testimony, and is based upon the Company's proposed level of Missouri retail revenues.

Q. Why are the equal rates of return for all customer classes, embedded in this study, an appropriate starting point when designing electric utility rates?

A. There are several reasons why equal class rates of return are an appropriate starting point in the consideration of rate design. First and foremost is the consideration of equity and fairness to all electric customers. Purely from a cost perspective and ignoring all other factors, to overcharge one customer class in order to subsidize another class is not supportable.

A second important consideration in support of equal class rates of return is the goal of encouraging cost effective utilization of electricity by customers. To make appropriate decisions regarding the most efficient and effective use of electricity, as well as the acquisition of electrical consuming equipment, customers require correct and appropriate price signals from the Company's electric rates.

A third consideration is that of competition. Cost-based electric rates permit the Company to compete effectively with alternative fuels, co-generation and other electric utilities for new commercial and industrial customers.

Q. Once the annual "cost-based" revenue requirements are developed by this process for all of our customer classes, would the design of specific rates for each class be the next and final step in the overall rate development process?

A. If one were to base class rates solely on class costs of service and ignore other relevant factors, the response is yes. However, the results of Mr. Warwick's study produced the following revenue increase by customer class:

Customer Class	Cost of Service Increase
Residential Service	21%
Small General Service	6%
Large General and Small Primary Service	4%
Large Primary Service	14%
Large Transmission Service	5%

Q. Is the Company proposing that these cost based class revenue requirements be utilized in developing class rates in the case?

A. No, the Company is proposing a departure from class revenue requirements or rate design being established solely on the basis of equal class rates of return as shown in its class cost of service study.

Q. Why is the Company proposing to vary from the cost based revenue requirements?

A. The Company recognizes that factors other than cost of service are relevant to determining class revenue requirements. These factors may include, but not be limited to, revenue stability, public acceptance, and value of service.

Q. What is the Company's proposal for allocating the revenue increase requested in this case?

A. The Company is proposing to allocate the revenue increase requested in this case somewhat consistent with the Commission approved Nonunanimous Stipulation and Agreement Concerning Class Cost of Service and Certain Rate Design Issues ("Stipulation

and Agreement") in its most recently completed rate case (Case No. ER-2007-0002). This Stipulation and Agreement was signed by representatives from the Missouri Public Service Commission Staff, the Office of Public Counsel, the Missouri Department of Natural Resources, Missouri Department of Economic Development, the State of Missouri, American Association of Retired Persons, Consumers Council of Missouri, Missouri Association for Social Welfare, Missouri Energy Group, Missouri Industrial Energy Consumers, Missouri Retailers Association, Noranda Aluminum, The Commercial Group, and the Company, and contained a formulaic method (Appendix A to Stipulation and Agreement), attached hereto as Schedule WLC-E7, to allocate any revenue decrease or increase to the Company's customer classes in that case. It should be noted that the range of the revenue requirements proposed by parties in that case was from an annual decrease in revenues of approximately $160 million to an annual increase of approximately $350 million.

The Commission approved an annual increase of approximately $43 million in that case and, as stated above, the Company is now requesting an annual increase of approximately $251 million. If one were to add the approved increase of $43 million to the current requested increase of $251 million, then the total increase over rates in effect prior to Case No. ER-2007-0002 would be approximately $294 million or within the range of annual revenue changes addressed by the Stipulation and Agreement in Case No. ER-2007-0002.

While the above-referenced Stipulation and Agreement is not binding in this proceeding, the Company believes that it is reasonable to propose that the revenue increase in this case be allocated fairly consistently with the Stipulation and Agreement. Support for such reasonableness lies in: 1) class cost of service based revenue requirements in this case being consistent with those in Case No. ER- 2007-0002, 2) the recency of the Stipulation and

Agreement, 3) the range of the proposed revenue increase in this case plus the increase granted in Case No. ER-2007-0002 being within the proposed range of the increase contemplated in the Stipulation and Agreement and 4) the Commission's approval of the Stipulation and Agreement.

Q. Please explain the Company's proposal to allocate the revenue increase in this case fairly consistently with the Stipulation and Agreement in Case No. ER-2007-0002.

A. The Stipulation and Agreement contained three formulas for allocating the revenue change depending on the level of change (i.e., overall decrease, overall increase up to $200 million, and overall increase greater than $200 million). There was one common thread for each of these formulas—after certain adjustments were made to present class revenues to reflect a shifting of revenue responsibility among certain classes, the proposed revenue change would be allocated on an adjusted present revenue basis. That is, each class' adjusted present revenue as a percent of total class revenues was multiplied by the total revenue change for the determination of the increase/decrease to the class' revenue requirement. Similarly, the Company is proposing the use of the common thread, class percentage of total present revenues, to allocate the requested revenue increase in this case. This method results in an across-the-board or equal percentage increase for all customer classes.

Q. Please identify Schedule WLC-E8.

A. Schedule WLC-E8 summarizes the proposed class revenue requirements necessary to give the Company an opportunity, based upon test year figures, to achieve its jurisdictional rate of return.

Q. What was the source of the billing unit data used in the design of the Company's proposed rates?

A. Mr. Pozzo is providing direct testimony discussing the billing unit data used in the design of the proposed rates. The data contained in Schedules JRP-E1 through JRP-E6 of Mr. Pozzo's direct testimony in this case was used as a resource for the individual class billing units. They are based upon the Company's weather normalized sales during the test year in this case as discussed in the direct testimony of AmerenUE witness Steven M. Wills.

IV. CLASS RATES

Q. Please describe the Company's specific rate design proposal in this case.

A. The Company's rate design proposal in this case is consistent with that contained in Section 3, Rate Design Changes of the previously mentioned Stipulation and Agreement. More specifically, Section 3 states as follows:

a. For the computation of Class Rate levels:

(1) Within each rate schedule, all rate elements shall be increased or decreased by the same percentage as the overall increase or decrease for this class, except in the following cases:

(a) The customer charge on the residential rate shall not be changed under any of the scenarios. Any increase or decrease in residential class revenues shall be accomplished by factoring only the energy charges.

(b) The customer charges on the non-residential rate schedules shall increase if AmerenUE's overall revenue requirement increases. They will remain at current levels (i.e. not decrease) if there is an overall reduction.

(c) The demand and energy rates on the LGS and SPS rate schedules shall be adjusted, subject to class revenue constraints, in such a way to better align the implicit voltage differentials between the two.

(d) The adjustment to the Large Transportation Service rate schedule shall be accomplished first by eliminating the Annual Contribution Factor. If there is a revenue neutral reduction of less than $9.1 million to the LTS class, there shall be a fixed annual contribution factor in an amount equal to $9.1 million less the amount of the LTS class revenue neutral adjustment.

b. The following current rate design features of the AmerenUE rate schedules shall be maintained, to the extent possible:

(1) The customer charges on the SPS, LPS, and LTS rate schedules shall be the same.

(2) The rates ($ per kW) for Rider B voltage credits shall be the same under all applicable rate schedules.

(3) The rate ($ per billed kVar) associated with the Reactive Charge shall be the same under all applicable rate schedules.

(4) The rate ($ per month) associated with the Time-of-Day meter charge shall be the same under all applicable rate schedules.

(5) The Time-of-Day energy charge adjustments shall be the same on the LPS and LTS rate schedules.

I would note that where any of the above provisions were rendered moot (e.g. elimination of the Annual Contribution Factor of the Large Transmission Service Rate) by

rate design changes resulting from the adjudication of Case No. ER-2007-0002, said provisions are not reflected in the Company's proposed rate design in this case.

V. OTHER TARIFF CHANGES

Q. Is the Company proposing any revisions to its base rate tariffs to reflect the proposed addition of Rider FAC?

A. Yes. The Company is proposing tariff revisions to each of its Service Classifications to accommodate applicable kilowatt-hour billing under Rider FAC. The most significant changes for this accommodation involve revisions to the Company's non-metered lighting tariffs. These changes are needed to calculate the monthly energy usage for each of the Company's respective lighting unit offerings. Both rated wattage (i.e., rated demand) by lighting offering and monthly dusk-to-dawn lighting burn hours have been added to the lighting tariffs in order to make these calculations of monthly energy usage (i.e., rated wattage divided by 1,000 times monthly burn hours equals monthly kWh energy usage) by lighting unit for the application of Rider FAC. It should be noted that the monthly dusk-to-dawn lighting burn hours are the same as those approved by the Commission some years ago when the Company had a fuel adjustment clause in effect.

Q. Please explain the Company's proposed revision to its Voluntary Electronic Bill Rendering and Payment Program.

A. Currently, customers opting for participation in this program are required to affirmatively elect the discontinuation of a mailed or hand delivered bill. In other words, participating customers are required to inform the Company that they desire only an electronic bill. Absent this affirmative election, current program participants receive an electronic bill and a mailing or hand delivered bill. The Company's proposed change to the

program would automatically discontinue mailing or hand delivered bills to new program participants, therefore, promoting a cleaner environment. Existing program participants who have not affirmatively opted for discontinuation of a mailed or hand delivered bill will be "grandfathered", that is, unaffected by this change.

Q. Has the Company evaluated the impact of this proposed change on the revenue requirement that is being requested in this case?

A. No, it has not. While it is true that this proposal would result in lower billing costs for customers deciding to discontinue receipt of a paper bill, one cannot reasonably predict the participation level, if any, in the revised program. As a result, any attempt to calculate the impact of this proposed change on the Company's proposed revenue requirement would be speculative at best.

Q. Please explain the Company's proposal to modify its tariff provisions applicable to Underground Extensions to Individual Residential Customers.

A. Currently, the Company's Rules and Regulations applicable to individual residential customers require that customers pay to the Company, in advance of construction, a non-refundable contribution of any excess cost of the underground extension vs. the overhead extension. However, the Company's Rules and Regulations applicable to residential subdivisions require the customer/developer to install a conduit system for the installation of the Company's complete underground distribution facilities (i.e., primary cables, secondary voltage cables, manholes, etc.). To promote consistency of underground tariff provisions between individual residential customers and residential subdivisions and ease of customer and service representative understanding, the Company is proposing to change the rules for individual residential underground extensions to be consistent with the

rules for subdivision underground extensions. That is, individual residential customers desiring underground distribution extensions will be required to install a conduit system for the installation of the Company's underground distribution facilities (e.g., primary voltage and secondary voltage cables) necessary to provide the extension.

Additionally, this change should: 1) increase efficiency and reduce overall cost to customers by having the primary conduit installed by the same entity installing the service conduit and 2) afford the customer greater flexibility and control over the excavation work being done on his property. I would note that underground primary voltage extensions to individual residential customers are rare, as most individual residential customers only require an underground service line from existing primary voltage or secondary voltage facilities.

Q. Does this conclude your direct testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.	)))))	Case No. ER-2008-____

AFFIDAVIT OF WILBON L. COOPER

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Wilbon L. Cooper, being first duly sworn on his oath, states:

1. My name is Wilbon L. Cooper. I work in the City of St. Louis, Missouri, and I am employed by AmerenUE as Manager of Rate Engineering and Analysis.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of 24 pages, Attachment A and Schedules WLC-E1 through WLC-E8, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.

Wilbon L. Cooper

Subscribed and sworn to before me this 4th day of April, 2008.

Danielle R. Moskop
Notary Public

My commission expires:

Danielle R. Moskop
Notary Public - Notary Seal
STATE OF MISSOURI
St Louis County
My Commission Expires: July 21, 2009
Commission # 05745027

EXECUTIVE SUMMARY

Wilbon L. Cooper

Manager of the Rate Engineering Department of AmerenUE

* * * * * * * * * * *

My name is Wilbon L. Cooper and I am the Manager of the Rate Engineering Department of AmerenUE. The purpose of my testimony, and that of my associates, Mr. James R. Pozzo and Mr. William M. Warwick, is to address the following areas of the case:

Sales/Revenues

Class Cost of Service

Rate Design

Miscellaneous Tariff Revisions

Sales/Revenues - Sales, revenues and rate billing units, test year ending March 2008, as adjusted for customer growth through June 2008, were developed by Mr. Pozzo based upon the Company's weather normalized sales, and are provided in his schedules for use in the subsequent design of final rates as a part of this case.

Class Cost of Service – Mr. Warwick has performed a fully embedded class cost of service study that produced cost of service based revenue requirements at equal class rates of return for the test year ending March 2008. Included in this study was the use of the Average and Excess 4 NCP method for the allocation of fixed production costs. Generally, system peak demands and, to a major extent, excess customer demands, are the motivating factors which influence the amount of capacity the Company must add to its generation system to provide for its customers' maximum demands. However, the type of capacity (base, intermediate or

peaking) which the Company must add is not dictated by maximum customer demand alone, but also by the annual energy, or kilowatt-hours, which will be required to be generated by such capacity, i.e., the generation unit's utilization factor. The 4 NCP method gives proper weighting to both a) class peak demands and b) class energy consumption (average demands) which is required to properly address both of the above considerations associated with capacity planning. The A&E methodology gives weight to both of these considerations by its inclusion of both average class demands, which are kilowatt-hours divided by total annual hours (8,760), and the excess NCP demands of each class. Additionally, Mr. Warwick's study further delineated the study results functionally among production, transmission and distribution and, also, classified the costs as either customer, energy, or demand related for the development of specific rates within the classes. The class revenue requirements from this study result in the following percentage increases for the Company's major customer classes: Residential 21%, Small General Service 6%, Large General Service/Small Primary Service 4%, Large Primary Service 14% and Large Transmission Service 5%.

Rate Design - While cost based rates are an important starting point in developing class revenue targets and rate design, there are other factors (e.g. public acceptance, rate stability, and revenue stability from year to year) that should be considered when determining class revenue requirements and designing rates. The Company's recently completed electric rate (Case No. ER-2007-0002) provided some insight on the consideration of other factors as many parties in the case signed and the Commission approved a nonunanamous Stipulation and Agreement Concerning Class Cost of Service and Certain Rate Design Issues ("Stipulation and Agreement"). This Stipulation and Agreement did not adopt any party's class cost of service results, but, rather contained a formulaic method to allocate any revenue

decrease or increase to the Company's customer classes in that case. The Company is proposing to allocate the revenue increase requested in this case somewhat consistently with the Stipulation and Agreement. That is, the Company is proposing to allocate the requested revenue increase in this case on an across-the-board or equal percentage increase for all customer classes. This method results in a 12.1% percent increase to all customer classes.

Miscellaneous Tariff Revisions – Company witness Martin J. Lyons, Jr. is sponsoring the addition of a Fuel Adjustment Clause ("FAC") Rider to the Company's tariffs and, as a result, other tariff changes were necessary to accommodate revised FAC billing for the Company's respective customer classes. I am sponsoring these other FAC related changes along with several miscellaneous tariff revisions that are primarily of a housekeeping nature. These changes improve ease of customer understanding and administration and are of very limited application. Such proposed changes have no impact on the Company's base rate revenues.

SERVICE CLASSIFICATION NO. 1(M)
RESIDENTIAL SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	$7.25
Energy Charge - per kWh	8.97¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	$7.25
Energy Charge - per kWh	
First 750 kWh	6.38¢
Over 750 kWh	4.30¢

Optional Time-of-Day Rate

Customer Charge - per month	$15.00
Energy Charge - per kWh (1)	
Summer (June-September billing periods)	
All On Peak kWh	13.06¢
All Off Peak kWh	5.35¢
Winter (October-May billing periods)	
All On Peak kWh	7.70¢
All Off Peak kWh	3.81¢

(1) On-peak and Off-peak hours applicable herein shall be as specified in Rider I, paragraph A.

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

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

Term of Use. Initial period one (1) year, terminable thereafter on three (3) days' notice.

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

* Indicates Change. **Indicates Addition.

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

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	
Single Phase Service	$8.36
Three Phase Service	$17.40
Energy Charge - per kWh	8.55¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	
Single Phase Service	$8.36
Three Phase Service	$17.40
Energy Charge - per kWh	
Base Use	6.37¢
Seasonal Use(1)	3.68¢

(1) The winter seasonal energy use shall be all kWh in excess of 1,000 kWh per month and in excess of the lesser of a) the kWh use during the preceding May billing period, or b) October billing period, or c) the maximum monthly kWh use during any preceding summer month.

Optional Time-of-Day Rate

Customer Charge - per month	
Single Phase Service	$17.28
Three Phase Service	$34.56
Energy Charge - per kWh (2)	
Summer (June-September billing periods)	
All On Peak kWh	12.69¢
All Off Peak kWh	5.17¢
Winter (October-May billing periods)	
All On Peak kWh	8.35¢
All Off Peak kWh	3.83¢

(2) On-peak and Off-peak hours applicable herein shall be as specified in Rider I, paragraph A.

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

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

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	$75.22
Energy Charge - per kWh	
First 150 kWh per kW of Billing Demand	8.42¢
Next 200 kWh per kW of Billing Demand	6.34¢
All Over 350 kWh per kW of Billing Demand	4.26¢
Demand Charge - per kW of Total Billing Demand	$3.93

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	$75.22
Base Energy Charge - per kWh	
First 150 kWh per kW of Base Demand	5.31¢
Next 200 kWh per kW of Base Demand	3.93¢
All Over 350 kWh per kW of Base Demand	3.09¢
Seasonal Energy Charge - Seasonal kWh	3.09¢
Demand Charge - per kW of Total Billing Demand	$1.46

Optional Time-of-Day Adjustments

Additional Customer Charge - per Month $15.88 per month

Energy Adjustment - per kWh	On-Peak Hours(1)	Off-Peak Hours(1)
Summer kWh(June-September billing periods)	+1.00¢	-0.56¢
Winter kWh(October-May billing periods)	+0.30¢	-0.17¢

(1) On-peak and off-peak hours applicable herein shall be as specified in Rider I, paragraph A.

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

*Indicates Change. **Indicates Addition.

SERVICE CLASSIFICATION NO. 4(M)
SMALL PRIMARY SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	$243.51
Energy Charge - per kWh	
First 150 kWh per kW of Billing Demand	8.14¢
Next 200 kWh per kW of Billing Demand	6.13¢
All Over 350 kWh per kW of Billing Demand	4.12¢
Demand Charge - per kW of Total Billing Demand	$3.26
Reactive Charge - per kVar	28.00¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	$243.51
Base Energy Charge - per kWh	
First 150 kWh per kW of Base Demand	5.13¢
Next 200 kWh per kW of Base Demand	3.81¢
All Over 350 kWh per kW of Base Demand	2.99¢
Seasonal Energy Charge - Seasonal kWh	2.99¢
Demand Charge - per kW of Total Billing Demand	$1.19
Reactive Charge - per kVar	28.00¢

Optional Time-of-Day Adjustments

Additional Customer Charge - per Month $15.88 per month

Energy Adjustment - per kWh	On-Peak Hours(1)	Off-Peak Hours(1)
Summer kWh(June-September billing periods)	+0.73¢	-0.40¢
Winter kWh(October-May billing periods)	+0.27¢	-0.15¢

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

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

*Indicates Change. **Indicates Addition.

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED

*Rate per Unit per Month
Lamp and Fixture

A. Standard horizontal burning, enclosed luminaire on existing wood pole:

High Pressure Sodium		Mercury Vapor (1)	
Lumens	Rate	Lumens	Rate
9,500	$ 8.92	6,800	$ 8.92
25,500	$12.90	20,000	$12.90
50,000	$22.99	54,000	$22.99
		108,000	$45.99

B. Standard side mounted, hood with open bottom glassware on existing wood pole:

High Pressure Sodium		Mercury Vapor (1)	
Lumens	Rate	Lumens	Rate
		3,300	$7.22
9,500	$7.90	6,800	$7.90

C. Standard post-top luminaire including standard 17-foot post:

High Pressure Sodium		Mercury Vapor (1)	
Lumens	Rate	Lumens	Rate
		3,300	$15.63
9,500	$16.53	6,800	$16.53

D. Pole-mounted, direction flood luminaire; limited to installations accessible to Company basket truck:

High Pressure Sodium		Metal Halide		Mercury Vapor (1)	
Lumens	Rate	Lumens	Rate	Lumens	Rate
25,500	$16.37	34,000	$16.37	20,000	$16.37
50,000	$25.88	100,000	$51.75	54,000	$25.88

(1) Mercury Vapor lamps and fixtures are limited to customers served under contracts initiated prior to September 27, 1988. Company will continue to maintain these lamps and fixtures so long as parts are economically available.

*Indicates Change.

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED (Cont'd.)

* E. All poles and cable, where required to provide lighting service:

1. After September 27, 1988 the installation of all standard poles and cables shall be paid for in advance by customer, with all subsequent replacements of said facilities provided by Company.

2. Installations prior to September 27, 1988:

	Monthly Rate	
Wood Pole	$ 7.98	per pole
Ornamental Concrete Pole	$17.89	per pole
Steel Breakaway Pole	$53.80	per pole
Standard Two-Conductor Overhead Cable	$ 2.48	per span
Underground Cable Installed In and Under Dirt	7.34¢	per foot
All Other Underground Cable Installations	13.98¢	per foot

* F. Incandescent lamps provided under contracts initiated prior to September 30, 1963, which facilities will not be maintained by Company after June 30, 1981:

Lamp and Fixture	Per Unit Monthly Rate
1,000 Lumens	$ 8.55
2,500 "	11.55
4,000 "	13.33
6,000 "	14.78
10,000 "	20.08

*Indicates Change

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED (Cont'd.)

G. Former Subsidiary Company lighting units provided under contracts initiated prior to April 9, 1986, which facilities will only be maintained by Company so long as parts are available in Company's present stock:

Lamp and Fixture	*Per Unit Monthly Rate
11,000 Lumens, Mercury Vapor, Post-Top	$16.53
11,000 Lumens, Mercury Vapor, Open Bottom	7.90
11,000 Lumens, Mercury Vapor, Horizontal Enclosed	8.92
42,000 Lumens, Mercury Vapor, Horizontal Enclosed	22.99
5,800 Lumens, H.P. Sodium, Open Bottom	7.22
16,000 Lumens, H.P. Sodium, Horizontal Enclosed	8.92
34,200 Lumens, H.P. Sodium, Directional(2)	16.37
140,000 Lumens, H.P. Sodium, Directional	51.75
20,000 Lumens, Metal Halide, Directional	16.37

(2) This lamp represents a mercury vapor fixture with H.P. Sodium lamp.

Term of Contract. Minimum term of three (3) years where only standard facilities are installed; ten (10) years where post-top luminaires are installed.

Discount for Franchised Municipal Customers. A 10% discount will be applied to bills rendered for lighting facilities served under the above rates and currently contracted for by municipalities with whom the Company has an ordinance granted electric franchise as of September 27, 1988. The above discount shall only apply for the duration of said franchise. Thereafter, the above discount shall apply only when the following two conditions are met: 1) any initial or subsequent ordinance granted electric franchise must be for a minimum term of twenty (20) years and 2) Company must have a contract for all lighting facilities for municipal lighting service provided by Company in effect.

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

*Indicates Change.
**Indicates Addition.

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED (Cont'd.)

*Fuel and Purchased Power Adjustment (Rider FAC). The kilowatt hours for lighting service provided under the terms of this Service Classification shall be subject to the provisions of Company's Fuel and Purchased Power Adjustment Clause (Rider FAC). The kilowatt hour consumption of each lamp, whose operating hours are determined by a photoelectric control, shall be determined from the manufacturer's rated wattage multiplied by the number of hours of operation for the month, in accordance with the following schedules:

Lamp Size (Lumens)	Rating (Watts)
H. P. Sodium	
5,800	70
9,500	120
16,000	202
25,500	307
34,200	360
50,000	482
140,000	1000
Mercury Vapor	
3,300	127
6,800	207
11,000	294
20,000	455
42,000	700
54,000	1080
108,000	2160
Metal Halide	
20,000	294
34,000	450
100,000	1100
Incandescent	
1,000	103
2,500	202
4,000	327
6,000	448
10,000	690

Billing Month	Burning Hours
January	408
February	347
March	346
April	301
May	279
June	255
July	272
August	298
September	322
October	368
November	387
December	417

*Indicates Addition.

SERVICE CLASSIFICATION NO. 6(M)
STREET AND OUTDOOR AREA LIGHTING - CUSTOMER-OWNED

*Monthly Rate For Metered Service

Customer Charge Per Meter	$5.37 per month
Energy Charge	3.63¢ per kWh

*Rate Per Unit Per Month For Unmetered Service

Customer Charge per account $5.37 per month

H.P. Sodium	Energy & Maintenance(1)	Energy Only(2)
9,500 Lumens, Standard	$ 2.89	$ 1.40
16,000 Lumens, Standard	N/A	2.38
25,500 Lumens, Standard	5.03	3.59
50,000 Lumens, Standard	7.25	5.63
Metal Halide		
5,500 Lumens, Standard	$ 4.18	N/A
12,900 Lumens, Standard	5.00	N/A
Mercury Vapor	(3)	
3,300 Lumens, Standard	$ 2.89	$ 1.49
6,800 Lumens, Standard	3.77	2.41
11,000 Lumens, Standard	5.08	3.43
20,000 Lumens, Standard	6.75	5.30
42,000 Lumens, Standard	N/A	8.82
54,000 Lumens, Standard	14.40	12.61

(1) Company will furnish electric energy, furnish and replace lamps, wash lamps and luminaires, and adjust and replace control mechanisms, as required.

(2) Limited to lamps served under contracts initiated prior to September 27, 1988.

(3) Maintenance of lamps and fixtures limited to customers served under contracts prior to November 15, 1991.

N/A--Not Available.

Term of Contract. One (1) year, terminable thereafter on three (3) days' notice.

Discount For Franchised Municipal Customers. A 10% discount will be applied to bills rendered for lighting facilities served under the above rates and currently contracted for by municipalities with whom the Company has an ordinance granted electric franchise as of September 27, 1988. The above discount shall only apply for the duration of said franchise. Thereafter, the above discount shall apply only when the following two conditions are met: 1) any initial or subsequent ordinance granted electric franchise must be for a minimum term of twenty (20) years and 2) Company must have a contract for all lighting facilities for municipal lighting service provided by Company in effect.

*Indicates Change.

SERVICE CLASSIFICATION NO. 6(M)
STREET AND OUTDOOR AREA LIGHTING - CUSTOMER-OWNED (Cont'd.)

*Fuel and Purchased Power Adjustment (Rider FAC). The kilowatt hours for lighting service provided under the terms of this Service Classification shall be subject to the provisions of Company's Fuel and Purchased Power Adjustment Clause (Rider FAC). The kilowatt hour consumption of each lamp, whose operating hours are determined by a photoelectric control, shall be determined from the manufacturer's rated wattage multiplied by the number of hours of operation for the month, in accordance with the following schedules:

Lamp Size (Lumens)	Rating (Watts)	Billing Month	Burning Hours
H. P. Sodium		January	408
9,500	120	February	347
16,000	202	March	346
25,500	307	April	301
50,000	482	May	279
		June	255
Mercury Vapor		July	272
3,300	127	August	298
6,800	207	September	322
11,000	294	October	368
20,000	455	November	387
42,000	700	December	417
54,000	1080		
Metal Halide			
5,500	122		
12,900	206		

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

*Indicates Addition.

SERVICE CLASSIFICATION NO. 7(M)
MUNICIPAL STREET LIGHTING - INCANDESCENT
RATE OF LIMITED APPLICATION

*Rate per Lamp per Month

	Incandescent				
	1,000 Lumen	2,500 Lumen	4,000 Lumen	6,000 Lumen	10,000 Lumen
Wood Pole Rates	$3.64	$5.55	$7.57	$10.05	$13.76

Ornamental Pole. Add $5.99 per month per pole to above Wood Pole charges.

*Circuit Charge per Month

Underground, in and under dirt, per ft.	7.57¢
Underground, all other, per ft.	14.41¢

(In lieu of a monthly circuit charge, customer may elect to pay to Company at the time of installation the estimated excess installed cost of underground over overhead circuit.)

*Customer-Owned Street Lighting Facilities. Where customer furnishes, installs and owns all street lighting facilities, service will be supplied as follows:

For Metered Service:

Customer Charge per Meter	$12.51 per month
1) Secondary Service	3.64¢ per kWh
2) Primary Service - Rider C shall be applied.	

Customer shall install suitable switching and protective equipment, meter loop, space and mounting facilities for Company metering devices.

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

Payments. Bills are due and payable within ten (10) days from date of bill.

Term of Contract. Ten (10) years. Customer, if not legally authorized to contract for all of an initial or succeeding ten-year contract term at one time, may sign an agreement for the maximum period for which it is legally authorized to contract, and said agreement will continue in force thereafter for successive one-year periods unless terminated by either party by written notice given not less than sixty (60) days prior to any annual termination date.

*Indicates Change.

SERVICE CLASSIFICATION NO. 7(M)
MUNICIPAL STREET LIGHTING - INCANDESCENT
RATE OF LIMITED APPLICATION (Cont'd.)

*Fuel and Purchased Power Adjustment (Rider FAC). The kilowatt hours for lighting service provided under the terms of this Service Classification shall be subject to the provisions of Company's Fuel and Purchased Power Adjustment Clause Rider (FAC). The kilowatt hour consumption of each lamp, whose operating hours are determined by a photoelectric control, shall be determined from the manufacturer's rated wattage multiplied by the number of hours of operation for the month, in accordance with the following schedules:

Lamp Size (Lumens)	Rating (Watts)
Incandescent	
1,000	103
2,500	202
4,000	327
6,000	448
10,000	690

Billing Month	Burning Hours
January	408
February	347
March	346
April	301
May	279
June	255
July	272
August	298
September	322
October	368
November	387
December	417

*Indicates Addition.

SERVICE CLASSIFICATION NO. 8(M)
PRIVATE ORNAMENTAL STREET LIGHTING RATES
RATE OF LIMITED APPLICATION

*Rate per Lamp per Month

Lumen Rating of Series Lamps		
1000	2500	4000
$9.62	$11.55	$13.56

*Circuit Charge per Month

Underground, in and under dirt, per ft.	7.57¢
Underground, all other, per ft.	14.41¢

(In lieu of a monthly circuit charge, customer may elect to pay to Company at the time of installation the estimated excess installed cost of underground over overhead circuit.)

*Customer-Owned Street Lighting Facilities. Where customer furnishes, installs and owns all street lighting facilities, service will be supplied as follows:

For Metered Service:

Customer Charge per Meter	$12.51 per month
1) Secondary Service	3.64¢ per kWh
2) Primary Service - Rider C shall be applied.	

Customer shall install suitable switching and protective equipment, meter loop, space and mounting facilities for Company metering devices.

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

Payments. Bills are due and payable within ten (10) days from date of bill.

Term of Contract. Ten (10) years.

*Indicates Change.

SERVICE CLASSIFICATION NO. 8(M)
PRIVATE ORNAMENTAL STREET LIGHTING RATES
RATE OF LIMITED APPLICATION (Cont'd.)

*Fuel and Purchased Power Adjustment (Rider FAC). The kilowatt hours for lighting service provided under the terms of this Service Classification shall be subject to the provisions of Company's Fuel and Purchased Power Adjustment Clause (Rider FAC). The kilowatt hour consumption of each lamp, whose operating hours are determined by a photoelectric control, shall be determined from the manufacturer's rated wattage multiplied by the number of hours of operation for the month, in accordance with the following schedules:

Lamp Size (Lumens)	Rating (Watts)
Incandescent	
1,000	103
2,500	202
4,000	327

Billing Month	Burning Hours
January	408
February	347
March	346
April	301
May	279
June	255
July	272
August	298
September	322
October	368
November	387
December	417

*Indicates Addition.

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

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	$243.51
Energy Charge - per kWh	2.68¢
Demand Charge - per kW of Billing Demand	$16.08
Reactive Charge - per kVar	28.00¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	$243.51
Energy Charge - per kWh	2.38¢
Demand Charge - per kW of Billing Demand	$7.32
Reactive Charge - per kVar	28.00¢

Optional Time-of-Day Adjustments

Additional Customer Charge - per month $15.88 per month

Energy Adjustment - per kWh	On-Peak Hours(1)	Off-Peak Hours(1)
Summer kWh(June-September billing periods)	+0.52¢	-0.29¢
Winter kWh(October-May billing periods)	+0.24¢	-0.12¢

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

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

Payments. Bills are due and payable within ten (10) days from date of bill.

Term of Use. One (1) year, terminable thereafter on three (3) days' notice.

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

*Indicates Change. **Indicates Addition.

MISCELLANEOUS CHARGES

A. Reconnection Charges per Connection Point

Sheet No. 106, Par. B-3 (Annually Recurring Service)	$30.00
Sheet No. 184, Par. I (Reconnection of Service)	30.00

*B. Supplementary Service Minimum Monthly Charges

Sheet No. 103, Par. C-3

Charges applicable during 4 monthly billing periods of June through September	Primary Service Rate
Customer Charge per month, plus	$243.51
All kW @	$16.08

Charges applicable during 8 monthly billing periods of October through May	Primary Service Rate
Customer Charge per month, plus	$243.51
All kW @	$7.32

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

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

*Indicates Change.

SERVICE CLASSIFICATION NO. 12(M)
LARGE TRANSMISSION SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during four (4) monthly billing periods of June through September)

Customer Charge - per month	$243.51
Demand Charge - per kW of Billing Demand	$13.465
Energy Charge - per kWh	2.555¢
Reactive Charge - per kVar	28.000¢

Winter Rate (Applicable during eight (8) monthly billing periods of October through May)

Customer Charge - per month	$243.51
Demand Charge - per kW of Billing Demand	$5.133
Energy Charge - per kWh	2.250¢
Reactive Charge - per kVar	28.000¢

Optional Time-of-Day Adjustments

Additional Customer Charge - per month	$15.88

Energy Adjustment - per kWh	On-Peak Hours(1)	Off-Peak Hours(1)
Summer kWh (June-September Billing Periods)	+0.52¢	-0.29¢
Winter kWh (October-May Billing Periods)	+0.24¢	-0.12¢

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

**Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

* Indicates Change.
** Indicates Addition.

SERVICE CLASSIFICATION NO. 12(M)
LARGE TRANSMISSION SERVICE RATE (Cont'd.)

* Energy Line Loss Rate. Compensation for Customer's energy line losses from use of the transmission system(s) outside Company's control area shall be in the form of energy solely supplied by Company to the transmission owner(s) and compensated by payment at a monthly rate of $0.0345 per kWh after appropriate Rider C adjustment of meter readings.

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

* Indicates Change

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*Indicates Addition.

Rider B

DISCOUNTS APPLICABLE FOR SERVICE TO SUBSTATIONS OWNED BY CUSTOMER IN LIEU OF COMPANY OWNERSHIP

Where a Customer served under rate schedules 4(M) or 11 (M) takes delivery of power and energy at a delivery voltage of 34kV or higher, Company will allow discounts from its applicable rate schedule as follows:

*1. A monthly credit of $0.93/kW of billing demand for customers taking service at 34.5 or 69kV

*2. A monthly credit of $1.10/kW of billing demand for customers taking service at 115kV or higher

*Indicates Change.

GENERAL RULES AND REGULATIONS
III. DISTRIBUTION SYSTEM EXTENSIONS

J. Supplementary Distribution Extensions

Supplementary extensions from extensions previously installed and covered under existing guarantee agreements initiated by other customers, will be made in accordance with the provisions of this Section III.J. In such instances of supplementary extensions, the guarantee amounts of the current customers served from that portion of the original extension utilized by the supplementary extension will be adjusted considering the additional revenues and facilities, if any, associated with the new customers being served. Such revised guarantee amounts will be applicable to all customers, prior and new, served from the facilities being guaranteed for the remainder of the terms of any prior guarantee agreements.

K. Underground Extensions

1. General

The Company's distribution system is generally designed and constructed as an overhead system, and electric service will normally be provided by overhead distribution extensions. Where underground distribution extensions are required by law or requested by a customer or applicant for service, underground service will be provided to a point of delivery for such service, specified by Company, under the provisions of this Section III.K. Where abnormal circumstances exist resulting in an underground extension costing less to install than an overhead extension, or Company elects to make an underground extension due to life cycle cost, engineering, construction or safety considerations, the Company's rules for overhead extensions shall apply to the estimated cost of the underground extension.

* 2. Individual Residential Customer Extensions

Where an underground extension is requested by an individual residential customer or required by law, Company will estimate the cost of equivalent overhead and underground extensions, and customer will pay a non-refundable contribution to Company, in advance of construction, for any excess cost of making the underground extension. The Company's rules for overhead extensions to individual residential customers shall apply to Company's estimated overhead extension costs. Customer, at his option, may install a direct buried service cable to be owned and maintained by customer, or Company will install, own, operate and maintain the service cable in customer's conduit, installed by customer in service trench in accordance with Company specifications to a delivery point designated by Company. Where Company determines that primary distribution facilities are necessary to provide the requested service, the customer will install the primary conduit system, consisting of

*Indicates Change.

GENERAL RULES AND REGULATIONS
III. DISTRIBUTION SYSTEM EXTENSIONS

* conduit, manholes, pulling boxes, transformer pads, switchgear pads, pedestal bases and other required subsurface structures to a point designated by Company. All such materials will be provided by Company for customer pick-up at a location designated by the Company and included in the cost for underground service. Company will install, own, operate and maintain the primary cable in customer's conduit system. Where applicable, the underground extension may be provided by Company in accordance with the rules herein applicable to overhead extensions, Section III.E, herein.

3. Residential Subdivision Extensions

Where an underground distribution extension for permanent electric service in a residential subdivision is requested to two or more single-family residential buildings, multiple occupancy units, or mobile homes, by an applicant/developer, or is required by law, applicant shall first satisfy the Company's applicable rules for overhead extensions to residential subdivisions, Section III.F, herein. Thereafter, applicant shall contract for and satisfy the requirements specified in this Section III.K.3. for obtaining an underground residential distribution extension.

a. Requirements of Applicant/Developer - Applicant will initially provide, at its cost, all trenching and the installation of a complete conduit system as its contribution to the Company's underground distribution system within a residential subdivision. The conduit system installation by applicant will consist of conduit, manholes, pulling boxes, transformer pads, switchgear pads, pedestal bases and other required subsurface structures. All such materials will be provided by Company at no cost to applicant, excluding subdivisions covered by the Large Lot Subdivision provisions below. Applicants for electric service to individual single family homes shall, subsequently, provide and install service trench and service conduit. All installations will be in accordance with Company's design criteria and specifications, the National Electrical Safety Code and any other applicable codes.

b. Requirements of Company - The Company's distribution system within the subdivision will consist of all primary and secondary voltage and service cables installed by Company, including street lighting circuitry and the conduit system

*Indicates Change.

VOLUNTARY ELECTRONIC BILL RENDERING AND PAYMENT PROGRAM

1. AVAILABILITY

This program will be made available on a voluntary basis to customers who are billed under Service Classifications No. 1(M) or No. 2(M) with postcard billing (i.e., not required to have demand metering) provided customer has access to a personal computer and the Internet.

*2. GENERAL DESCRIPTION

This program will permit the Company to deliver to program participants, including participants in the Company's Budget Bill Plan, an electronic image of a bill through the use of the Internet, instead of mailing or hand delivery of a bill. As part of the enrollment process, the customer will choose a login identification number and a password as a means to prevent others from viewing the customer's bills. Customers participating in this program prior to May 4, 2008 will have to affirmatively elect the discontinuation of mailed or hand delivered bills.

Company will provide the customer's account data to a designated vendor ("vendor") chosen by the Company, which will in turn format this data into a bill layout. This electronic bill layout may not exactly resemble the customer's paper bill layout.

The Company or the designated vendor will present the bill to the customer via the Internet and, also, provide the customer a means to pay the bill via the Internet. However, customers may continue to pay the bill via all payment options available to those not participating in the program.

*3. CUSTOMER COST

Neither the Company nor the vendor will require the customer to pay any fee for participation in this program.

4. TERM

Customers may terminate participation in this program at any time.

* Indicates Change.

AmerenUE
CASE NO. ER-2008-
PRESENT AND PROPOSED CLASS REVENUE REQUIREMENTS
($000's)

Customer Class	Current Base Revenue	Proposed Base Revenue	Required Revenue Adjustment	% Change
Residential	$ 890,574	$ 998,168	$ 107,594	12.1%
Small General Service	$ 240,911	$ 270,038	$ 29,127	12.1%
Large General Service	$ 441,035	$ 494,357	$ 53,322	12.1%
Small Primary Service	$ 184,138	$ 206,407	$ 22,269	12.1%
Large Primary Service	$ 161,268	$ 180,762	$ 19,494	12.1%
Large Transmission Service	$ 128,201	$ 143,699	$ 15,498	12.1%
Lighting	$ 28,441	$ 31,882	$ 3,441	12.1%
Total	$ 2,074,568	$ 2,325,313	$ 250,745 (1)	12.1%

(1) - Targeted increase from Company witness Mr. Gary Weiss testimony is $250,806; however, rate rounding resulted in a shortfall of approximately $61K.

MISSOURI
RESIDENTIAL SERVICE CLASSIFICATION NO. 1(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

kWh	AVERAGE MONTHLY BILL
100	$14.49
150	$18.12
200	$21.74
250	$25.36
300	$28.98
350	$32.60
400	$36.22
450	$39.85
500	$43.47
550	$47.09
600	$50.71
650	$54.33
700	$57.95
750	$61.58
800	$64.50
850	$67.43
900	$70.36
950	$73.29
1000	$76.22
1100	$82.07
1200	$87.93
1300	$93.79
1400	$99.64
1500	$105.50
1600	$111.36
1700	$117.21
1800	$123.07
1900	$128.93
2000	$134.78
2500	$164.07
3000	$193.35
3500	$222.63
4000	$251.92
4500	$281.20
5000	$310.48

MISSOURI
SMALL GENERAL SERVICE CLASSIFICATION NO. 2(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES
SINGLE-PHASE SERVICE

kWh	AVERAGE MONTHLY BILL
0	$8.36
50	$11.91
100	$15.46
300	$29.65
400	$36.75
500	$43.84
600	$50.94
700	$58.04
800	$65.13
900	$72.23
1000	$79.33
2,000	$150.29
3,000	$221.26
4,000	$292.23
5,000	$363.19
6,000	$434.16
7,000	$505.13
8,000	$576.09
9,000	$647.06
10,000	$718.03
11,000	$788.99
12,000	$859.96
13,000	$930.93
14,000	$1,001.89
15,000	$1,072.86
16,000	$1,143.83
17,000	$1,214.79
18,000	$1,285.76
19,000	$1,356.73
20,000	$1,427.69
21,000	$1,498.66
22,000	$1,569.63
23,000	$1,640.59
24,000	$1,711.56
25,000	$1,782.53
30,000	$2,137.36
35,000	$2,492.19
40,000	$2,847.03
45,000	$3,201.86
50,000	$3,556.69

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
SMALL GENERAL SERVICE CLASSIFICATION NO. 2(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES
THREE-PHASE SERVICE

kWh	AVERAGE MONTHLY BILL
0	$17.40
50	$20.95
100	$24.50
300	$38.69
400	$45.79
500	$52.88
600	$59.98
700	$67.08
800	$74.17
900	$81.27
1000	$88.37
2,000	$159.33
3,000	$230.30
4,000	$301.27
5,000	$372.23
6,000	$443.20
7,000	$514.17
8,000	$585.13
9,000	$656.10
10,000	$727.07
11,000	$798.03
12,000	$869.00
13,000	$939.97
14,000	$1,010.93
15,000	$1,081.90
16,000	$1,152.87
17,000	$1,223.83
18,000	$1,294.80
19,000	$1,365.77
20,000	$1,436.73
21,000	$1,507.70
22,000	$1,578.67
23,000	$1,649.63
24,000	$1,720.60
25,000	$1,791.57
30,000	$2,146.40
35,000	$2,501.23
40,000	$2,856.07
45,000	$3,210.90
50,000	$3,565.73

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
LARGE GENERAL SERVICE CLASSIFICATION NO. 3(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
100	100	10,000	$938.22
	200	20,000	$1,492.22
	300	30,000	$1,965.55
	400	40,000	$2,376.22
	500	50,000	$2,724.22
	600	60,000	$3,072.22
	700	70,000	$3,420.22
500	100	50,000	$4,390.22
	200	100,000	$7,160.22
	300	150,000	$9,526.89
	400	200,000	$11,580.22
	500	250,000	$13,320.22
	600	300,000	$15,060.22
	700	350,000	$16,800.22
1000	100	100,000	$8,705.22
	200	200,000	$14,245.22
	300	300,000	$18,978.55
	400	400,000	$23,085.22
	500	500,000	$26,565.22
	600	600,000	$30,045.22
	700	700,000	$33,525.22
2,000	100	200,000	$17,335.22
	200	400,000	$28,415.22
	300	600,000	$37,881.89
	400	800,000	$46,095.22
	500	1,000,000	$53,055.22
	600	1,200,000	$60,015.22
	700	1,400,000	$66,975.22
3,000	100	300,000	$25,965.22
	200	600,000	$42,585.22
	300	900,000	$56,785.22
	400	1,200,000	$69,105.22
	500	1,500,000	$79,545.22
	600	1,800,000	$89,985.22
	700	2,100,000	$100,425.22
5,000	100	500,000	$43,225.22
	200	1,000,000	$70,925.22
	300	1,500,000	$94,591.89
	400	2,000,000	$115,125.22
	500	2,500,000	$132,525.22
	600	3,000,000	$149,925.22
	700	3,500,000	$167,325.22

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
SMALL PRIMARY SERVICE CLASSIFICATION NO. 4(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
100	100	10,000	$1,044.84
	200	20,000	$1,580.68
	300	30,000	$2,039.01
	400	40,000	$2,436.51
	500	50,000	$2,773.18
	600	60,000	$3,109.84
	700	70,000	$3,446.51
500	100	50,000	$4,250.18
	200	100,000	$6,929.34
	300	150,000	$9,221.01
	400	200,000	$11,208.51
	500	250,000	$12,891.84
	600	300,000	$14,575.18
	700	350,000	$16,258.51
1000	100	100,000	$8,256.84
	200	200,000	$13,615.18
	300	300,000	$18,198.51
	400	400,000	$22,173.51
	500	500,000	$25,540.18
	600	600,000	$28,906.84
	700	700,000	$32,273.51
2,000	100	200,000	$16,270.18
	200	400,000	$26,986.84
	300	600,000	$36,153.51
	400	800,000	$44,103.51
	500	1,000,000	$50,836.84
	600	1,200,000	$57,570.18
	700	1,400,000	$64,303.51
3,000	100	300,000	$24,283.51
	200	600,000	$40,358.51
	300	900,000	$54,108.51
	400	1,200,000	$66,033.51
	500	1,500,000	$76,133.51
	600	1,800,000	$86,233.51
	700	2,100,000	$96,333.51
5,000	100	500,000	$40,310.18
	200	1,000,000	$67,101.84
	300	1,500,000	$90,018.51
	400	2,000,000	$109,893.51
	500	2,500,000	$126,726.84
	600	3,000,000	$143,560.18
	700	3,500,000	$160,393.51

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

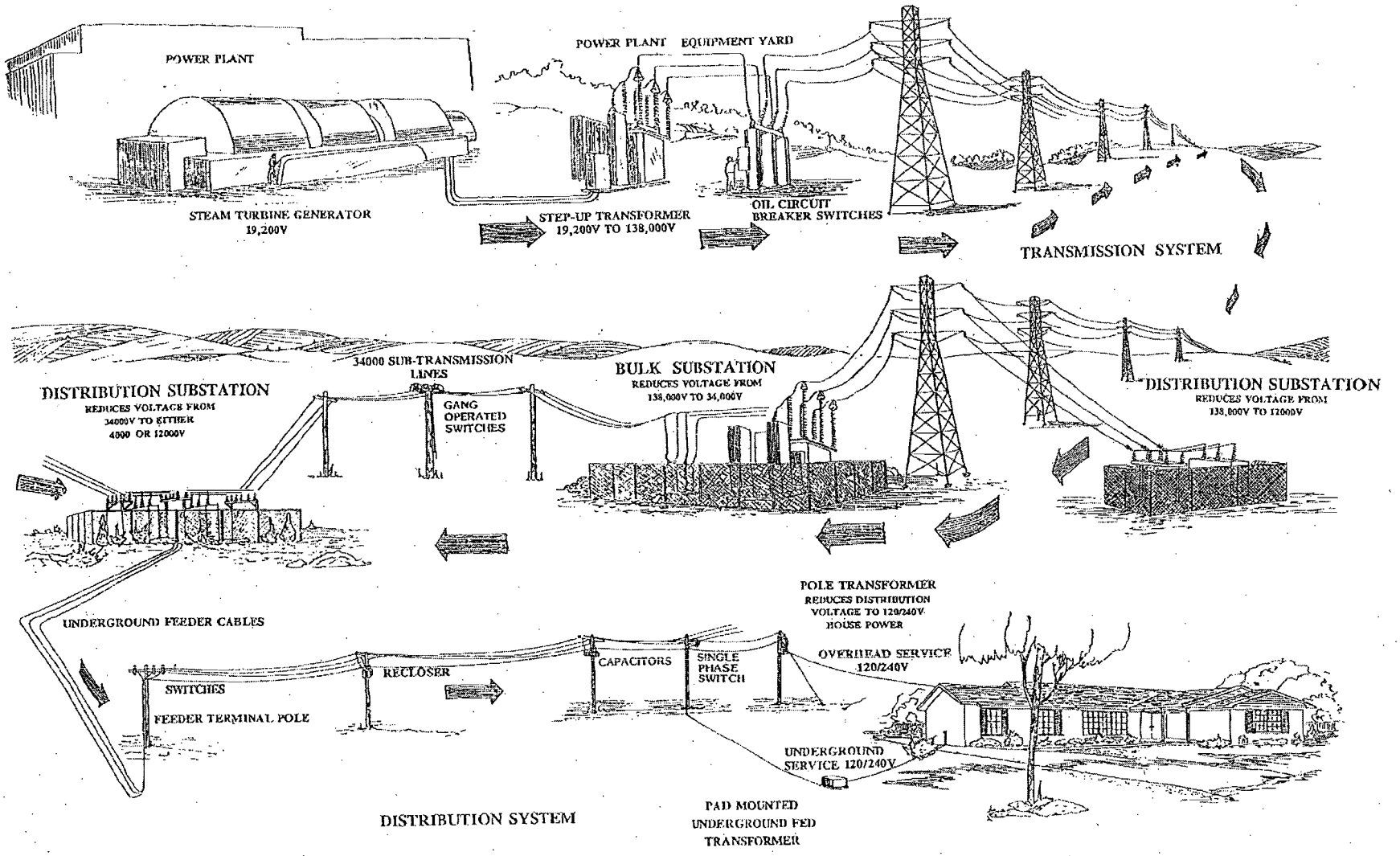
MISSOURI
LARGE PRIMARY SERVICE CLASSIFICATION NO. 11(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

	kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
*	4,000	300	1,200,000	$81,204.00
		400	1,600,000	$91,124.00
		500	2,000,000	$101,044.00
		600	2,400,000	$110,964.00
		700	2,800,000	$120,884.00
	5,000	300	1,500,000	$88,644.00
		400	2,000,000	$101,044.00
		500	2,500,000	$113,444.00
		600	3,000,000	$125,844.00
		700	3,500,000	$138,244.00
	10,000	300	3,000,000	$177,044.00
		400	4,000,000	$201,844.00
		500	5,000,000	$226,644.00
		600	6,000,000	$251,444.00
		700	7,000,000	$276,244.00
	20,000	300	6,000,000	$353,844.00
		400	8,000,000	$403,444.00
		500	10,000,000	$453,044.00
		600	12,000,000	$502,644.00
		700	14,000,000	$552,244.00
	30,000	300	9,000,000	$530,644.00
		400	12,000,000	$605,044.00
		500	15,000,000	$679,444.00
		600	18,000,000	$753,844.00
		700	21,000,000	$828,244.00
	50,000	300	15,000,000	$884,244.00
		400	20,000,000	$1,008,244.00
		500	25,000,000	$1,132,244.00
		600	30,000,000	$1,256,244.00
		700	35,000,000	$1,380,244.00
	100,000	300	30,000,000	$1,768,244.00
		400	40,000,000	$2,016,244.00
		500	50,000,000	$2,264,244.00
		600	60,000,000	$2,512,244.00

MISSOURI
LARGE TRANSMISSION SERVICE CLASSIFICATION NO. 12(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

	kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
*	4,000	300	1,200,000	$68,015.67
		400	1,600,000	$77,422.33
		500	2,000,000	$86,829.00
		600	2,400,000	$96,235.67
		700	2,800,000	$105,642.33
	5,000	300	1,500,000	$75,070.67
		400	2,000,000	$86,829.00
		500	2,500,000	$98,587.33
		600	3,000,000	$110,345.67
		700	3,500,000	$122,104.00
	10,000	300	3,000,000	$149,897.33
		400	4,000,000	$173,414.00
		500	5,000,000	$196,930.67
		600	6,000,000	$220,447.33
		700	7,000,000	$243,964.00
	20,000	300	6,000,000	$299,550.67
		400	8,000,000	$346,584.00
		500	10,000,000	$393,617.33
		600	12,000,000	$440,650.67
		700	14,000,000	$487,684.00
	30,000	300	9,000,000	$449,204.00
		400	12,000,000	$519,754.00
		500	15,000,000	$590,304.00
		600	18,000,000	$660,854.00
		700	21,000,000	$731,404.00
	50,000	300	15,000,000	$748,510.67
		400	20,000,000	$866,094.00
		500	25,000,000	$983,677.33
		600	30,000,000	$1,101,260.67
		700	35,000,000	$1,218,844.00
	100,000	300	30,000,000	$1,496,777.33
		400	40,000,000	$1,731,944.00
		500	50,000,000	$1,967,110.67
		600	60,000,000	$2,202,277.33
		700	70,000,000	$2,437,444.00

GENERATING AND POWER DISTRIBUTION SYSTEM



Schedule WLC-E4

AmerenUE
MISSOURI ELECTRIC OPERATIONS
CLASS COST OF SERVICE ALLOCATION STUDY
12 MONTHS ENDED MARCH 2008 WITH UPDATES FOR KNOWN AND MEASURABLE CHANGES THROUGH JUNE 30, 2008

TITLE: SUMMARY CCOS PRESENT ROR ($000's)

		MISSOURI	RESIDENTIAL	SMALL GEN SERV	LARGE G.S. / SMALL PRIMARY	LARGE PRIMARY	LARGE TRANS
1	BASE REVENUE	$ 2,046,127	$ 890,574	$ 240,911	$ 625,173	$ 161,268	$ 128,201
2	OTHER REVENUE	$ 77,380	$ 39,333	$ 8,339	$ 20,124	$ 5,550	$ 4,034
3	LIGHTING REVENUE	$ 28,441	$ 14,007	$ 3,355	$ 7,824	$ 2,022	$ 1,233
4	SYSTEM, OFF-SYS SALES & DISP OF ALLOW	$ 260,067	$ 116,518	$ 30,426	$ 77,040	$ 20,915	$ 15,168
5							
6	TOTAL OPERATING REVENUE	$ 2,412,014	$ 1,060,431	$ 283,031	$ 730,161	$ 189,755	$ 148,636
7							
8	TOTAL PROD, T&D, CUST, AND A&G EXP	$ 1,529,164	$ 677,975	$ 161,884	$ 443,729	$ 135,313	$ 110,262
9	TOTAL DEPR AND AMMORT EXPENSES	$ 328,502	$ 170,323	$ 39,568	$ 86,502	$ 20,955	$ 11,153
10	REAL ESTATE AND PROPERTY TAXES	$ 98,511	$ 49,521	$ 11,776	$ 26,660	$ 6,664	$ 3,890
11	INCOME TAXES	$ 196,111	$ 96,583	$ 23,133	$ 53,950	$ 13,943	$ 8,502
12	PAYROLL TAXES	$ 20,218	$ 9,765	$ 2,232	$ 5,569	$ 1,625	$ 1,027
13	FEDERAL EXCISE TAX	$ -	$ -	$ -	$ -	$ -	$ -
14	REVENUE TAXES	$ -	$ -	$ -	$ -	$ -	$ -
15							
16	TOTAL OPERATING EXPENSES	$ 2,172,506	$ 1,004,168	$ 238,593	$ 616,410	$ 178,501	$ 134,834
17							
18	NET OPERATING INCOME	$ 239,508	$ 56,263	$ 44,438	$ 113,751	$ 11,254	$ 13,802
19							
20	GROSS PLANT IN SERVICE	$ 12,131,480	$ 6,097,120	$ 1,449,569	$ 3,283,426	$ 821,590	$ 479,775
21	RESERVES FOR DEPRECIATION	$ 5,342,894	$ 2,708,041	$ 639,779	$ 1,435,055	$ 353,703	$ 206,316
22							
23	NET PLANT IN SERVICE	$ 6,788,586	$ 3,389,078	$ 809,790	$ 1,848,371	$ 467,887	$ 273,459
24							
25	MATERIALS & SUPPLIES - FUEL	$ 284,601	$ 103,603	$ 28,042	$ 92,920	$ 30,736	$ 29,300
26	MATERIALS & SUPPLIES - LOCAL	$ 35,258	$ 21,503	$ 4,478	$ 7,817	$ 1,416	$ 43
27	CASH WORKING CAPITAL	$ 358	$ 159	$ 38	$ 104	$ 32	$ 26
28	CUSTOMER ADVANCES & DEPOSITS	$ (17,461)	$ (9,750)	$ (3,982)	$ (3,729)	$ -	$ -
29	ACCUMULATED DEFERRED INCOME TAXES	$ (1,191,761)	$ (599,096)	$ (142,463)	$ (322,522)	$ (80,625)	$ (47,056)
30							
31	TOTAL NET ORIGINAL COST RATE BASE	$ 5,899,581	$ 2,905,498	$ 695,903	$ 1,622,962	$ 419,445	$ 255,772
32							
33	RATE OF RETURN	4.060%	1.936%	6.386%	7.009%	2.683%	5.396%

AmerenUE
MISSOURI ELECTRIC OPERATIONS
EQUALIZED CLASS RATES OF RETURN ANALYSIS
12 MONTHS ENDED MARCH 2008 WITH UPDATES FOR KNOWN AND MEASURABLE CHANGES THROUGH JUNE 30, 2008

TITLE: SUMMARY CCOS EQUAL ROR ($000's)

		MISSOURI	RESIDENTIAL	SMALL GEN SERV	LARGE G.S. / SMALL PRIMARY	LARGE PRIMARY	LARGE TRANS
1	BASE REVENUE	$ 2,296,933	$ 1,075,786	$ 254,310	$ 646,306	$ 184,874	$ 135,657
2	OTHER REVENUE	$ 77,380	$ 39,333	$ 8,339	$ 20,124	$ 5,550	$ 4,034
3	LIGHTING REVENUE	$ 28,441	$ 14,007	$ 3,355	$ 7,824	$ 2,022	$ 1,233
4	SYSTEM, OFF-SYS SALES & DISP OF ALLOW	$ 260,067	$ 116,518	$ 30,426	$ 77,040	$ 20,915	$ 15,168
5							
6	TOTAL OPERATING REVENUE	$ 2,662,820	$ 1,245,644	$ 296,430	$ 751,295	$ 213,361	$ 156,091
7							
8	TOTAL PROD., T&D, CUSTOMER, AND A&G EXP.	$ 1,529,164	$ 677,975	$ 161,884	$ 443,729	$ 135,313	$ 110,262
9	TOTAL DEPR. AND AMMOR. EXPENSES	$ 328,502	$ 170,323	$ 39,568	$ 86,502	$ 20,955	$ 11,153
10	REAL ESTATE AND PROPERTY TAXES	$ 98,511	$ 49,521	$ 11,776	$ 26,660	$ 6,664	$ 3,890
11	INCOME TAXES	$ 196,111	$ 96,583	$ 23,133	$ 53,950	$ 13,943	$ 8,502
12	PAYROLL TAXES	$ 20,218	$ 9,765	$ 2,232	$ 5,569	$ 1,625	$ 1,027
13	FEDERAL EXCISE TAX	$ -	$ -	$ -	$ -	$ -	$ -
14	REVENUE TAXES	$ -	$ -	$ -	$ -	$ -	$ -
15							
16	TOTAL OPERATING EXPENSES	$ 2,172,506	$ 1,004,168	$ 238,593	$ 616,410	$ 178,501	$ 134,834
17							
18	NET OPERATING INCOME	$ 490,314	$ 241,476	$ 57,837	$ 134,884	$ 34,860	$ 21,257
19							
20	GROSS PLANT IN SERVICE	$ 12,131,480	$ 6,097,120	$ 1,449,569	$ 3,283,426	$ 821,590	$ 479,775
21	RESERVES FOR DEPRECIATION	$ 5,342,894	$ 2,708,041	$ 639,779	$ 1,435,055	$ 353,703	$ 206,316
22							
23	NET PLANT IN SERVICE	$ 6,788,586	$ 3,389,078	$ 809,790	$ 1,848,371	$ 467,887	$ 273,459
24							
25	MATERIALS & SUPPLIES - FUEL	$ 284,601	$ 103,603	$ 28,042	$ 92,920	$ 30,736	$ 29,300
26	MATERIALS & SUPPLIES - LOCAL	$ 35,258	$ 21,503	$ 4,478	$ 7,817	$ 1,416	$ 43
27	CASH WORKING CAPITAL	$ 358	$ 159	$ 38	$ 104	$ 32	$ 26
28	CUSTOMER ADVANCES & DEPOSITS	$ (17,461)	$ (9,750)	$ (3,982)	$ (3,729)	$ -	$ -
29	ACCUMULATED DEFERRED INCOME TAXES	$ (1,191,761)	$ (599,096)	$ (142,463)	$ (322,522)	$ (80,625)	$ (47,056)
30							
31	TOTAL NET ORIGINAL COST RATE BASE	$ 5,899,581	$ 2,905,498	$ 695,903	$ 1,622,962	$ 419,445	$ 255,772
32							
33	RATE OF RETURN	8.311%	8.311%	8.311%	8.311%	8.311%	8.311%

Appendix A
Class Revenue Targets

3/20/2007 1 pm

Line			TOTAL	RESIDENTIAL	SMALL GEN SERV	LARGE GEN SERV	SMALL PRIMARY	LARGE PRIMARY	LARGE TRANSMISSION	LIGHTING & OTHER	check
1	**True Up Revenue**		**$2,015,626,284**	**$855,465,244**	**$230,284,507**	**$425,281,208**	**$181,098,048**	**$160,594,741**	**$135,652,313**	**$27,250,223**	-
	Overall Revenue Requirement Reduction										
2	First 20.15 Million Decrease - design basis		(20,150,000)			(9,938,791)			(9,938,791)	(272,418)	-
3	Allocation Factor up to $20.15 M		100.0000%			49.3240%			49.3240%	1.3520%	
4	Additional Decrease - design basis		(91,712,099)	(8,554,650)	(9,521,820)	(34,815,777)	(18,608,880)	(1,605,950)	(17,365,799)	(1,239,223)	-
5	Allocation Factor for additional		100.0000%	9.3277%	10.3823%	37.9620%	20.2905%	1.7511%	18.9351%	1.3512%	-
6	**Example**	**$**	**(50,000,000)**	(2,784,325)	(3,099,115)	(21,270,458)	(6,056,726)	(522,697)	(15,590,925)	(675,754)	-
7	Percent Change		-2.48%	-0.33%	-1.35%	-5.00%	-3.34%	-0.33%	-11.49%	-2.48%	
	Overall Increase Up To $200 M										
8	Adjustments to Revenue at example overall increase level (see notes 2 & 3)		$0	9,338,792	1,215,131	(3,018,125)	1,555,591	847,402	(9,938,792)	-	-
9	Adjusted Revenues		$2,015,626,284	864,804,036	231,499,638	422,263,083	182,653,639	161,442,143	125,713,521	27,250,223	-
10	Allocation Factor		100.0000%	42.9050%	11.4852%	20.9495%	9.0619%	8.0095%	6.2369%	1.3519%	-
11	**Example**	**$**	**90,000,000**	47,953,273	11,551,852	15,836,401	9,711,283	8,055,977	(4,325,541)	1,216,753	-
12	Percent Change		4.47%	5.61%	5.02%	3.72%	5.36%	5.02%	-3.19%	4.47%	
	Overall Increase Greater Than $200 M										
13	Adjustments to Revenue at example overall increase level (see notes 2 & 3)		$0	4,350,000	552,332	(1,371,875)	434,360	385,183	(4,350,000)	-	-
14	Adjusted Revenues		$2,015,626,284	859,815,244	230,836,839	423,909,333	181,532,408	160,979,924	131,302,313	27,250,223	-
15	Allocation Factor		100.0000%	42.6575%	11.4524%	21.0311%	9.0063%	7.9866%	6.5142%	1.3519%	-
16	**Example**	**$**	**210,000,000**	93,930,694	24,602,295	42,793,534	19,347,491	17,157,034	9,329,860	2,839,091	-
17	Percent Change		10.42%	10.98%	10.68%	10.06%	10.68%	10.68%	6.88%	10.42%	

Note 1. The allocation of any increase or decrease will be according to this mechanism. Adjustments on lines 8 and 13 vary depending on the amount of the approved increase.
Note 2. In the increase scenarios the LGS adjustment = -$425,281,208 * 1% * (1 -(increase amount/$310 million)). The offset is spread among SGS, SPS, and LPS as an equal % of the True-up Revenue applicable to each of these classes.
Note 3. In the zero to $200 million increase range there is a an adjustment to SPS of + $600 thousand in addition to the note 2 adjustment.
Note 4. In the above $200 million increase range the Note 2 adjustment is zero at increase levels greater than $310,000,000.

AmerenUE
CASE NO. ER-2008-
PRESENT AND PROPOSED CLASS REVENUE REQUIREMENTS
($000's)

Customer Class	Proposed Base Revenue
Residential	$ 998,168
Small General Service	$ 270,038
Large General Service	$ 494,357
Small Primary Service	$ 206,407
Large Primary Service	$ 180,762
Large Transmission Service	$ 143,699
Lighting	$ 31,882
Total	$ 2,325,313