Exhibit No.:

Issues: Cost of Service, Revenue Allocation,

and Rate Design

Witness: Maurice Brubaker
Type of Exhibit: Surrebuttal Testimony

Sponsoring Party: Missouri Industrial Energy Consumers

Case No.: ER-2012-0166
Date Testimony Prepared: September 7, 2012

DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, d/b/a Ameren Missouri's Tariff to Increase Its Annual Revenues for Electric Service **Case No. ER-2012-0166**Tariff No. YE-2012-0370

Surrebuttal Testimony and Schedules of

Maurice Brubaker

on Cost of Service, Revenue Allocation and Rate Design

On behalf of

Missouri Industrial Energy Consumers

September 7, 2012



DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

d/b/a Ameren Miss	nion Electric Company, souri's Tariff to Increase ues for Electric Service)	Case No. ER-2012-0166 Tariff No. YE-2012-0370
STATE OF MISSOURI) ,		

Affidavit of Maurice Brubaker

Maurice Brubaker, being first duly sworn, on his oath states:

SS

COUNTY OF ST. LOUIS

- 1. My name is Maurice Brubaker. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.
- 2. Attached hereto and made a part hereof for all purposes are my surrebuttal testimony and schedules which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2012-0166.
- 3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show.

Maurice Brubaker

Subscribed and sworn to before me this 6th day of September, 2012.

TAMMY S. KLOSSNER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires: Mar. 14, 2015
Commission # 11024862

Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, d/b/a Ameren Missouri's Tariff to Increase Its Annual Revenues for Electric Service **Case No. ER-2012-0166** Tariff No. YE-2012-0370

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company,)
d/b/a Ameren Missouri's Tariff to Increase)
Its Annual Revenues for Electric Service)

Case No. ER-2012-0166 Tariff No. YE-2012-0370

Surrebuttal Testimony of Maurice Brubaker

1	Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	Α	Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,
3		Chesterfield, MO 63017.
4	Q	ARE YOU THE SAME MAURICE BRUBAKER WHO HAS PREVIOUSLY FILED
5		TESTIMONY IN THIS PROCEEDING?
6	Α	Yes. I have previously filed direct and rebuttal testimony on class cost of service and
7		revenue allocation issues presented in this proceeding and direct testimony on
8		revenue requirement issues.
9	Q	ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN
10		YOUR PRIOR TESTIMONY?
11	Α	Yes. This information is included in Appendix A to my revenue requirement direct
12		testimony filed July 6, 2012.
13	Q	ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?
14	Α	This testimony is presented on behalf of the Missouri Industrial Energy Consumers
15		("MIEC").

Introduction and Summary

Q WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A The purpose is to address certain cost of service and revenue allocation positions taken in the rebuttal testimony of other parties.

First, I address the position taken by Staff witness Scheperle with respect to the identification and separate assignment of energy efficiency ("EE")¹ related costs by customer class. I then respond to certain cost of service and revenue allocation positions taken by Ameren Missouri witnesses Warwick and Cooper, and by Office of Public Counsel ("OPC") witness Meisenheimer.

I also present a comparison of the results of the cost of service studies that have been presented in this case.

12 Q WHAT ARE YOUR PRINCIPAL FINDINGS AND RECOMMENDATIONS?

- 13 A These are as follows:
 - EE expenditures are different from all other elements of the revenue requirement in this case, and vary significantly across customer classes.
 - 2. The responsibility for EE costs ranges from 5% in the case of the Residential class to "zero" in the case of the Large Transmission Service ("LTS") customer class.
 - 3. The LTS customer has exercised the opt-out provisions in the MEEIA statute and in the Commission's Rules, does not participate in the EE program, and does not cause Ameren Missouri to incur EE related costs.
 - 4. Because of this opt-out, and the significant differences among customer classes in terms of responsibility for EE costs, proposals to allocate any approved increase on an equal percentage basis (Ameren Missouri), or nearly an equal percentage basis (Commission Staff) would essentially deny the benefit of the opt-out provision to the LTS customer. The increase to the LTS customer must be at least 4 percentage points less than the system average increase in order to recognize the opt-out.

Maurice Brubaker Page 2

¹As used in this testimony, EE refers to the investments related to the Missouri Energy Efficiency Investment Act ("MEEIA") as well as to those pre-MEEIA costs that are being amortized to income over a period of time.

- 1 5. In response to Staff's disagreement with my revenue allocation approach, I have 2 produced a class cost of service study that excludes the EE expenditures. The 3 results of this study are comparable to the results of the study contained in my direct testimony that included the EE revenue requirement components. The 4 5 conclusion to be drawn from these studies is that the rate spread recommendation I made in my direct testimony is supported by cost of service 6 7 studies, recognizes the unique nature of the EE expenditures, and appropriately 8 implements the opt-out provision.
 - OPC's cost of service studies should be rejected because they utilize methods that have recently been rejected by this Commission and contain other inappropriate allocations.
 - 7. The method the Staff and MIEC have used to classify production operation and maintenance ("O&M") expenses between fixed expenses and variable expenses is appropriate and should be adopted.
 - 8. Mr. Cooper's "illustrative" revenue requirement shift is not supported and should not be adopted.

17 Identification and Specific Assignment of

18 Energy Efficiency Related Revenue Requirements

19 Q WHAT IS MR. SCHEPERLE'S POSITION ON YOUR HANDLING OF EE REVENUE

REQUIREMENTS?

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Although Mr. Scheperle does not disagree with the class-specific assignments of costs related to EE, he nevertheless disagrees with how I have specifically assigned the EE related revenue requirement to customer classes as a part of my revenue allocation recommendation. He believes it is inappropriate to identify, and treat separately, a particular item that is included in a cost of service study.

26 Q HOW DO YOU RESPOND TO MR. SCHEPERLE?

27 A First, if we were setting rates so that each class earned the system average rate of 28 return (i.e., its cost of service), there would be no issue. All appropriate costs would 29 be assigned and the rates would properly reflect those costs. The primary reason for

1	not doing so is gradualism, in order to avoid too large of an impact on classes earning
2	below the system average rate of return, namely the Residential class and the
3	Lighting class.

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MR. SCHEPERLE ARGUES THAT IF YOU SEPARATELY TREAT ONE REVENUE REQUIREMENT ITEM, NAMELY EE COSTS, THAT IT WOULD BE APPROPRIATE TO SEPARATELY TREAT OTHER REVENUE REQUIREMENT ITEMS, WHICH HE ILLUSTRATES USING FUEL COST. DO YOU AGREE?

No. Fuel costs, along with costs such as generation and transmission costs, are incurred to provide electric service to all customers. There is no logic for separating out any of these items like there is for EE costs.

WHY ARE EE COSTS DIFFERENT AND WHY DO THEY REQUIRE SEPARATE ASSIGNMENT?

EE costs are not costs incurred to provide electric service in the conventional sense of the word. Rather, EE costs are those costs which are incurred, it could be said, "to not provide electric service." In other words, the EE costs are incurred to provide certain customers (who qualify under Ameren Missouri's EE programs) with devices and/or incentives which enable them to use less electricity while achieving the same degree of satisfaction, comfort, or level of production. In fact, these programs and costs are so different from other electric utility costs that legislation, extensive rulemaking and a separate proceeding were required in order to make these programs practical and capable of implementation.

As I noted in my rebuttal testimony, the responsibility for these costs varies significantly across customer classes. Because residential programs are the most

expensive to provide, and because of the sheer number of residential customers, the
EE related revenue requirement associated with the Residential class is 5% of its
revenues. The revenue requirement associated with these costs for the Small
General Service ("SGS") class is 2.2% of its revenues, for the Large General Service
("LGS")/Small Primary Service ("SPS") class is 4.3% of its revenues and for the Large
Power Service ("LPS") class is 4% of its revenues. In marked contrast, the LTS class
bears absolutely no cost responsibility for these programs. Operating in accordance
with the opt-out provision of the Commission Rules, the LTS customer has chosen to
fund its own EE activities, and not rely upon Ameren Missouri's general programs for
funding. Accordingly, the cost responsibility of the LTS class for EE programs is
"zero."

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WHAT ARE THE CONSEQUENCES IF THE INCREASE WERE TO BE APPLIED AS AN EQUAL PERCENTAGE (AS PROPOSED BY AMEREN MISSOURI) OR AS A NEARLY EQUAL PERCENTAGE (AS PROPOSED BY STAFF)?

Both of these approaches would ignore the nature of the EE costs and, with respect to the LTS customer, would essentially amount to a repudiation of the opt-out provision of the statute and the Commission Rules. As a result of implicitly assigning EE costs to the LTS customer, the LTS customer would essentially be required to involuntarily fund a program for which it receives no benefit and has opted out of the program in compliance with the Commission Rules.

1	Q	HAVE YOU PREPARED ANY ANALYSIS TO ADDRESS MR. SCHEPERLE'S
2		CONCERN ABOUT SEPARATELY ASSIGNING EE COSTS IN THE REVENUE
3		ALLOCATION STEP WHEN THOSE COSTS HAVE BEEN INCLUDED IN THE
4		CLASS COST OF SERVICE STUDY?
5	Α	Yes. I have prepared Schedule MEB-COS-SUR-1.
6	Q	PLEASE EXPLAIN THIS SCHEDULE.
7	Α	Schedule MEB-COS-SUR-1 is identical to the cost of service study presented in my
8		direct testimony as Schedule MEB-COS-4, with a single exception, namely that
9		Schedule MEB-COS-SUR-1 excludes all of the EE related revenue requirement
10		components.
11	Q	HOW DO THE RESULTS COMPARE TO THE COST OF SERVICE STUDY WHICH
12		YOU ATTACHED AS SCHEDULE MEB-COS-4 TO YOUR DIRECT TESTIMONY?
12 13	Α	YOU ATTACHED AS SCHEDULE MEB-COS-4 TO YOUR DIRECT TESTIMONY? The results are generally the same. That is, the Residential and Lighting classes
	A	
13	Α	The results are generally the same. That is, the Residential and Lighting classes
13 14	Α	The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates
13 14	A Q	The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates
13 14 15		The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates of return. ²
13 14 15 16		The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates of return. ² HOW DO THE REVENUE NEUTRAL ADJUSTMENTS AT PRESENT RATES FOR
13 14 15 16 17		The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates of return. ² HOW DO THE REVENUE NEUTRAL ADJUSTMENTS AT PRESENT RATES FOR THIS STUDY FORMAT COMPARE TO WHAT YOU CALCULATED EARLIER AND
113 114 115 116 117 118	Q	The results are generally the same. That is, the Residential and Lighting classes have below average rates of return while all other classes have above average rates of return. ² HOW DO THE REVENUE NEUTRAL ADJUSTMENTS AT PRESENT RATES FOR THIS STUDY FORMAT COMPARE TO WHAT YOU CALCULATED EARLIER AND SHOWED ON SCHEDULE MEB-COS-5 TO YOUR DIRECT TESTIMONY?

 $^{^{2}\}text{The details of the cost of service study are in the attachment to Schedule MEB-COS-SUR-1.}$

- 1 classes earning below their cost of service (Residential and Lighting) continue to be 2 below their cost of service.
- 3 Q WHAT IS THE OVERALL CONCLUSION TO BE DRAWN FROM THESE TWO
 4 SURREBUTTAL EXHIBITS?
- The overall conclusion is this: The revenue increase allocation that I proposed in my direct testimony is consistent with cost of service principles, respects the opt-out provision, particularly as it applies to Rate LTS, and is appropriate.

8 Q PLEASE EXPLAIN THE BASIS FOR THIS CONCLUSION.

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Referring again to Schedule MEB-COS-SUR-2, note that the increase required to move the Residential class to parity (excluding EE costs) is 8.2% before any increases awarded to Ameren Missouri. This is far higher than the modest 2% adjustment I proposed. Note also that the decreases appropriate for the business classes (SGS, LGS/SPS, LPS and LTS) are all more than the downward adjustment of 1.75% that I proposed.

Accordingly, whether revenue allocation proposals are tested against a class cost of service study that includes EE expenditures, or whether those revenue allocation proposals are tested against class cost of service results that do not include EE revenue requirements, the conclusion is the same. Namely: (1) a 2.0% revenue neutral increase to the Residential and Lighting classes, accompanied by an offsetting 1.75% decrease to all other customer classes, (2) plus a specific assignment of the EE revenue requirement, and (3) an equal percentage increase of any additional revenues (above the EE increase) on an equal percentage basis, is appropriate.

Q PLEASE EXPLAIN WHO BENEFITS FROM THE EE PROGRAMS?

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A In the short-run, only those customers who participate in the programs have the possibility of being better-off. They would be better off only if the savings that they experience in the electric bill is more than the sum of their directly incurred costs plus the EE charges that they would pay. Customers who do not participate, and who do not opt-out, clearly would be worse off because they are being charged for EE costs, yet receiving no direct benefit.

8 Q WHAT ARE THE EXPECTATIONS IN THE LONG-RUN?

9 A Please see Schedule MEB-COS-SUR-3 attached to my testimony. This is Ameren
10 Missouri's cost-effectiveness test summary which presents the results of the standard
11 cost-effectiveness measures for EE programs. The impact on rates is determined by
12 the ratepayer impact measure ("RIM").

13 Q WHAT IS THE BASIS OF THE RIM TEST?

14 A Under the RIM test, the benefits are the costs avoided as a result of implementing the
15 EE programs. The costs consist of incentives paid to participants, other costs
16 incurred by the utility, and the loss in revenues as a result of diminished consumption.
17 Costs also include the cost to administer, deliver and evaluate the EE program.

18 Q HOW SHOULD THE RESULTS OF THE RIM TEST BE INTERPRETED?

Under the RIM test, a ratio of less than 1.0 means that implementation of the program will cause rates to be higher than they would have been had the program not been implemented and instead the utility had pursued supply-side resources. Note that nearly all the programs have the effect of increasing rates.

1	In particular, the residential programs have a total RIM of 0.68, the business
2	programs have a total RIM of 0.79, and the overall composite portfolio has a RIM of
3	0.72.

Other Issues Raised By Staff

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5 Q MR. SCHEPERLE BELIEVES THAT ONLY THE STAFF APPROPRIATELY ADJUSTED CLASS DEMAND AND ENERGY FOR WEATHER AND FOR THE 6 ANTICIPATED AFFECTS OF EE. WHAT WOULD BE THE IMPACT OF MAKING 7 8 THESE ADJUSTMENTS? 9 Α As Mr. Scheperle states on page 6 of his testimony with respect to the EE 10 adjustment, "...this would not result in a significant variation." The difference in the 11 weather adjustment also does not produce a significant difference. This is clear from

Table 1 on page 3 of Mr. Scheperle's rebuttal testimony where he compares the class allocation factors for the various methods. Note that the allocation factors for every class under Staff's version of BIP, Ameren Missouri's A&E 4NCP allocation, MIEC's A&E 4NCP allocation and OPC's A&E 4NCP allocation are essentially the same

number. Accordingly, any differences created by these adjustments would be

insignificant and can be disregarded for purposes of this case.

OPC's Studies

- 19 Q IN YOUR REBUTTAL TESTIMONY, YOU ADDRESSED OPC'S COST OF
 20 SERVICE STUDIES. DO YOU HAVE ANY FURTHER RESPONSE TO
- 21 MS. MEISENHEIMER'S REBUTTAL TESTIMONY?
- Yes. While in her rebuttal testimony she may have corrected some minor errors, the basic studies presented by OPC continue to rely upon inappropriate allocation

methodologies including a generation allocation methodology previously rejected by this Commission on several occasions. OPC's allocation of the margin from off-system sales similarly has been previously rejected by this Commission on several occasions. OPC's allocation of the customer component of the distribution system is at odds with accepted procedures, and is an allocation method that I have never before seen employed. And, OPC's allocation of EE costs is at odds with the stipulation OPC signed in the MEEIA case. OPC's studies should be rejected.

Reply to Ameren Missouri

Q HOW DO YOU RESPOND TO AMEREN MISSOURI WITNESS WARWICK'S
TESTIMONY AT PAGE 5 OF HIS REBUTTAL CONCERNING THE
CLASSIFICATION OF CERTAIN NON-LABOR COSTS IN THE PRODUCTION
O&M ACCOUNTS?

Mr. Warwick provides only a very general response. He cites some particular items that he says could be variable, but does not provide any quantification of them. He is critical of my statement that the "hours of operation" used for scheduling maintenance is indicative of the fact that these costs are fixed because they occur on a periodic basis. Instead, he argues that hours of operation would be comparable to kWh. But, Ameren Missouri does not schedule its major maintenance on the basis of kWh generated by its units. Maintenance is performed to maintain plant efficiency and reliability and is not scheduled as a function of the number of kWh generated. Rather, the maintenance intervals are essentially fixed intervals of time as dictated by the calendar, and not by kWh.

1	Q	IS TH	IE CLASSIFICA	TION OI	F PRODUCTIO	N C	F O&M EXI	PENSE THAT	YOU	AND
2		MR.	SCHEPERLE	HAVE	EMPLOYED	Α	METHOD	ACCEPTED	IN	THE
3		INDU	STRY?							

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Yes. For example, in the current and previous Kansas City Power & Light Company rate cases (Case Nos. ER-2010-0355 and ER-2012-0174); the currently pending and previous KCP&L Greater Missouri Operations Company rate cases (Case Nos. ER-2010-0356 and ER-2012-0175); and in the previous Empire District Electric Company rate case (Case No. ER-2011-0004), where a class cost of service study was filed, the utilities (with de minimis exceptions) proposed the identical classification of production of O&M expense between fixed and variable categories that I have proposed in this case. It is also the method that the Commission Staff employed in the previously referenced Kansas City Power & Light Company rate cases when making allocations between Kansas and Missouri.

AT PAGE 10 OF HIS TESTIMONY, AMEREN WITNESS COOPER STATES THAT IF NON-RESIDENTIAL CLASSES RECEIVE NON-UNIFORM INCREASES, THEN THERE IS A POTENTIAL FOR RATE MIGRATION. ARE MR. COOPER'S CONCERNS VALID IN THE CONTEXT OF YOUR PROPOSAL?

No, I do not believe so. No customer is going to switch to the LTS rate, because no other customer is eligible to take service under this rate. The only possibility for migration under my proposal is from the LGS rate to SGS rate. The difference in the increase here is about 2 percentage points. But, the SGS rate is more than 20% higher than the LGS rate, so I do not think it is reasonable to believe that there would be switching from the lower price rate to the higher price rate. Accordingly, I do not

1		believe that there is any concern about rate switching under my revenue allocation
2		proposal.
3	Q	HAVE YOU REVIEWED THE TESTIMONY OF AMEREN MISSOURI WITNESS
4		COOPER AT PAGE 11 WITH RESPECT TO THE IMPACT OF RATE INCREASES
5		ON CUSTOMERS?
6	Α	Yes. At this point in his testimony, he quantifies, but does not support or recommend,
7		what would happen if 1% of the Residential class increase were transferred to other
8		classes.
9	Q	HOW DO YOU RESPOND TO THIS TESTIMONY OF MR. COOPER?
10	Α	First, I would note that I am pleased to see that he does not recommend that this
11		action be taken. It is not clear why he raises it or how it is supposed to be viewed,
12		but it obviously is not a recommendation by Ameren Missouri.
13	Q	WOULD SUCH A "SHIFT" IN REVENUES BE CONSISTENT WITH COST OF
14		SERVICE EVIDENCE?
15	Α	No, far from it. The cost of service evidence presented by Ameren Missouri, by the
16		Commission Staff and by MIEC all clearly demonstrate that the LPS and LTS
17		customers are providing a higher rate of return to the utility than is the Residential
18		class. Accordingly, any shift of any part of the rate increase away from the residential
19		customers to customers in any of these other customer classes would be contrary to
20		cost of service principles and evidence, and would be significantly in conflict with the

central regulatory principle that the causer of the cost should pay the cost.

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Comparison of Results

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2	Q	HAVE	YOU	COMPILED	A	COMPARISON	OF	THE	REVENUE	NEU	TRAL
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1		OE DE	TIIDNI	EOD THE VAI	חוכ	IIC CTIINIEC DDI	EGEN	ITED II	N THIS CAS	E 2	

This appears on Schedule MEB-COS-SUR-4. The information is presented both in a tabular and a graphical form. This specific information displayed is the percentage increase, at current rate levels, required to move each class to its cost of service. Page 1 of Schedule MEB-COS-SUR-4 displays the results for Ameren Missouri's study, the Staff's study, the MIEC study and the OPC study.

Page 2 of the schedule eliminates the OPC study from the comparison because it uses several methods that the Commission has previously rejected and, as discussed earlier, employs a treatment of EE expense that is contrary to the method prescribed in the stipulation in the MEEIA case to which OPC was a signatory.

15 Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

16 A Yes, it does.

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Electric Cost of Service Allocation Study at Present Rates

Includes MIEC Classification Adjustments and MIEC's Alternative Income Tax Calculation with Energy Efficiency Costs Removed

(Dollars in Thousands)

Line	Description	Missouri Total (1)			Residential	G	Small en. Service (3)		arge G.S./ m Primary (4)		Large Primary (5)	Tra	Large nsmission (6)	Lighting (7)	
			(1)		(2)		(3)		(4)		(5)		(0)		(1)
1	Base Revenue	\$	2,580,158	\$	1,170,105	\$	288,054	\$	749,850	\$	189,820	\$	147,949	\$	34,380
2	Other Revenue		68,583		38,657		6,658		15,873		3,763		3,078		555
3	Lighting Revenue		-		-		-		-		-		-		-
4	System, Off-Sys Sales & Disp of Allow		360,103		133,880		34,603		115,232		36,067		38,542		1,780
5	Rate Revenue Variance		-		-								-		
6	Total Operating Revenue	\$	3,008,844	\$	1,342,642	\$	329,314	\$	880,954	\$	229,650	\$	189,568	\$	36,715
7	Total Prod, T&D, Cust and A&G Expense	\$	1,901,528	\$	859,971	\$	194,420	\$	535,842	\$	150,943	\$	139,809	\$	20,543
8	Total Depreciation and Ammortization Expenses		447,077		236,756		48,758		109,943		25,538		17,341		8,741
9	Real Estate and Property Taxes		142,152		74,466		15,498		35,478		8,288		5,826		2,597
10	Income Taxes: At Present Rates		96,527		13,330		16,036		50,405		10,879		5,693		183
11	Payroll Taxes		23,042		11,897		2,428		5,845		1,463		985		425
12	Federal Excise Taxes		-		-		-		-		-		-		-
13	Revenue Taxes		-		-		-		-						
14	Total Operating Expenses	\$	2,610,326	\$	1,196,420	\$	277,140	\$	737,513	\$	197,110	\$	169,653	\$	32,489
15	Net Operating Income	\$	398,518	\$	146,222	\$	52,174	\$	143,441	\$	32,539	\$	19,915	\$	4,226
16	Gross Plant in Service	\$	14,532,731	\$	7,612,246	\$	1,584,049	\$	3,627,391	\$	847,768	\$	595,719	\$	265,557
17	Reserves for Depreciation		6,238,748	_	3,296,500		681,502		1,534,654		351,261		247,121	_	127,710
18	Net Plant in Service	\$	8,293,983	\$	4,315,746	\$	902,547	\$	2,092,738	\$	496,507	\$	348,598	\$	137,847
19	Materials & Supplies - Fuel	\$	260,508	\$	96,853	\$	25,033	\$	83,362	\$	26,092	\$	27,882	\$	1,287
20	Materials & Supplies - Local		170,308		108,482		19,556		30,290		5,016		3		6,961
21	Cash Working Capital		44,894		20,303		4,590		12,651		3,564		3,301		485
22	Customer Advances & Deposits		(19,448)		(10,815)		(4,742)		(3,617)		-		(125)		(149)
23	Accumulated Deferred Income Taxes	_	(2,017,383)	_	(1,056,796)		(219,937)	_	(503,492)	_	(117,621)		(82,674)		(36,862)
24	Total Net Original Cost Rate Base	\$	6,732,863	\$	3,473,773	\$	727,048	\$	1,711,931	\$	413,557	\$	296,985	\$	109,570
25	Rate of Return		5.919%		4.209%		7.176%		8.379%		7.868%		6.706%		3.857%

Electric Cost of Service Allocation Study at Present Rates

Includes MIEC Classification Adjustments and MIEC's Alternative Income Tax Calculation with Energy Efficiency Costs Removed (Dollars in Thousands)

TITLE:	NET ORI	GINAL COST - PAGE 1	ALL COATION		4100001101				014411		ADOE 0.0.1		14005		1.4505		
LINE #	ACCT#	<u>ITEM</u>	ALLOCATION BASIS	ı	MISSOURI TOTAL	RE	SIDENTIAL	G	SMALL EN SERVICE		ARGE G.S./ BM PRIMARY		LARGE PRIMARY	TR	LARGE		LIGHTING
<u> </u>	<u> 11001 </u>	<u></u>	<u> </u>		(1)	131	(2)		(3)		(4)		(5)		(6)		(7)
				_		_		_				_		_		_	
1 2		PRODUCTION	A.F.1	\$	4,934,309	\$	2,313,878	\$	525,577	\$	1,404,561	\$	356,515	\$	298,033	\$	35,745
3		TRANSMISSION															
4		LINES	A.F.2	\$	158,705	\$	70,339	\$	16,424	\$	47,321	\$	12,271	\$	12,077	\$	273
5		SUBSTATION	A.F.3	\$	320,495		142,045	\$	33,168	\$	95,562	\$	24,781	\$	24,388	\$	551
6																	
7		TOTAL TRANSMISSION		\$	479,200	\$	212,384	\$	49,593	\$	142,883	\$	37,052	\$	36,465	\$	824
8																	
9		DISTRIBUTION PLANT															
10	200	CLIDSTATION LAND	A F 0	œ.	10.500	¢.	0.001	œ	2.450	Φ.	F 000	¢.	1 202	¢.		Φ	140
11 12	360 321	SUBSTATION LAND OTHER LAND	A.F.8 A.F.5	\$ \$	19,560 12,525		9,981 6,520		2,159 1,410		5,889 3,846	\$ \$	1,392 658		-	\$ \$	140 91
13	321	OTTENEAND	A.I .5	Ψ	12,323	Ψ	0,320	Ψ	1,410	Ψ	3,040	Ψ	050	Ψ		Ψ	31
14	361-362	SUBSTATIONS	A.F.8	\$	564,299	\$	287,937	\$	62,274	\$	169,902	\$	40,148	\$	-	\$	4,039
15																	
16	364	POLES TOWERS FIXTURES															
17		CUSTOMER	A.F.4	\$	38,260		31,838		4,405		309	\$		\$	-	\$	1,706
18		HV	A.F.5a	\$	33,913		17,302		3,742		10,205	\$	2,413		-	\$	251
19		PRIMARY	A.F.5b	\$	65,148		33,912		7,334		20,003	\$	3,424		-	\$	476
20		SECONDARY LIGHTING-DIRECT	A.F.6	\$	33,215		19,975		,	\$	8,639	\$		\$	-	\$	280
21 22		LIGHTING-DIRECT	DIRECT	\$		\$		\$		\$	<u> </u>	\$		\$		\$	<u>-</u> _
23		SUBTOTAL		\$	170,537	Φ.	103,028	\$	19,802	\$	39,156	\$	5,838	\$	_	\$	2,713
24		OODTOTAL		Ψ	170,557	Ψ	100,020	Ψ	13,002	Ψ	33,130	Ψ	3,030	Ψ		Ψ	2,713
25	365	OVERHEAD CONDUCTOR															
26		CUSTOMER	A.F.4	\$	321,741	\$	267,736	\$	37,045	\$	2,600	\$	19	\$	-	\$	14,342
27		HV	A.F.5a	\$	101,932	\$	52,005	\$	11,247	\$	30,674	\$	7,251		-	\$	755
28		PRIMARY	A.F.5b	\$	352,469		183,474		39,681		108,219	\$	18,522		-	\$	2,574
29		SECONDARY	A.F.6	\$	18,505	\$	11,129	\$	2,407	\$	4,813	\$		\$		\$	156
30				_		_		_		_		_		_		_	
31		SUBTOTAL		\$	794,647	\$	514,343	\$	90,380	\$	146,306	\$	25,792	\$	-	\$	17,827
32 33	366	UNDERGROUND CONDUIT															
34	300	CUSTOMER	A.F.4	\$	130,418	\$	108,527	\$	15,016	\$	1,054	\$	8	\$	_	\$	5,814
35		HV	A.F.5a	\$	5,432		2,771		599		1,635	\$	386		_	\$	40
36		PRIMARY	A.F.5b	\$	39,132		20,370	\$	4,406		12,015	\$	2,056		-	\$	286
37		SECONDARY	A.F.6	\$	17,260	\$	10,380	\$	2,245	\$	4,489	\$	-	\$	-	\$	146
38																	
39		SUBTOTAL		\$	192,243	\$	142,049	\$	22,266	\$	19,192	\$	2,450	\$	-	\$	6,285
40																	
41	367	UNDERGROUND CONDUCTORS				_		_		_		_		_			
42		CUSTOMER	A.F.4	\$	272,881		227,077		31,419		2,205	\$	16		-	\$	12,164
43		HV	A.F.5a	\$	11,365		5,798		1,254		3,420	\$	808	\$	-	\$	84
44 45		PRIMARY SECONDARY	A.F.5b A.F.6	\$ \$	81,879 36 115		42,621	\$	9,218 4,697	\$ \$	25,139 9,393	\$ \$	4,303	\$ \$	-	\$ \$	598 305
45 46		SECONDARI	A.F.0	φ	36,115	\$	21,720	φ	4,097	φ	3,333	φ		Φ	<u>-</u> _	φ	305
46		SUBTOTAL		\$	402,240	\$	297,216	\$	46,589	\$	40,157	\$	5,127	\$	-	\$	13,151

Electric Cost of Service Allocation Study at Present Rates

Includes MIEC Classification Adjustments and MIEC's Alternative Income Tax Calculation with Energy Efficiency Costs Removed (Dollars in Thousands)

TITLE:	NET ORI	GINAL COST - PAGE 2															
LINE #	ACCT#	<u>ITEM</u>	ALLOCATION BASIS	ľ	MISSOURI <u>TOTAL</u> (1)	<u>R</u>	ESIDENTIAL (2)	GI	SMALL EN SERVICE (3)		ARGE G.S./ SM PRIMARY		LARGE <u>PRIMARY</u> (5)	TR	LARGE RANSMISSION		<u>LIGHTING</u>
1					(1)		(2)		(3)		(4)		(3)		(6)		(7)
2	368	LINE TRANSFORMERS															
3		CUSTOMER	A.F.15	\$	162,193		141,274		19,547		1,372	\$	-	\$	-	\$	-
4		SECONDARY	A.F.6	\$	122,013	\$	73,379	\$	15,870	\$	31,734	\$		\$	-	\$	1,029
5																	
6		SUBTOTAL		\$	284,206	\$	214,653	\$	35,418	\$	33,106	\$	-	\$	-	\$	1,029
7 8	200.4	OVER IEAD SERVICES															
8	369-1	OVERHEAD SERVICES CUSTOMER	A.F.15	\$	(18,307)	¢.	(15,945)	æ	(2,206)	d.	(155)	Φ		\$		\$	
10		SECONDARY	A.F.16	э \$	(26,619)		(18,499)		(3,432)		(4,688)	\$ \$	-	\$	-	\$	-
11		SECONDAIN	Α.Ι.ΙΟ	Ψ	(20,019)	Ψ	(10,499)	Ψ	(3,432)	Ψ	(4,000)	Ψ		Ψ		Ψ	
12		SUBTOTAL		\$	(44,926)	\$	(34,444)	\$	(5,639)	\$	(4,843)	\$	_	\$	_	\$	_
13		GODICIAL		Ψ	(44,320)	Ψ	(34,444)	Ψ	(3,033)	Ψ	(4,043)	Ψ		Ψ		Ψ	
14	369-2	UNDERGROUND SERVICES															
15		CUSTOMER	A.F.15	\$	40,156	\$	34,977	\$	4,840	\$	340	\$	_	\$	-	\$	-
16		SECONDARY	A.F.16	\$	2,302	\$	1,600	\$	297	\$	405	\$	-	\$	-	\$	-
17																	
18		SUBTOTAL		\$	42,458	\$	36,576	\$	5,136	\$	745	\$	-	\$	-	\$	-
19																	
20	370	METERS	A.F.7	\$	63,982	\$	41,849	\$	12,938	\$	8,430	\$	662	\$	46	\$	58
21																	
22	371	CUSTOMER INSTALLATIONS	DIRECT	\$	6	\$	-	\$	-	\$	3	\$	3	\$	-	\$	-
23	070	OTDEET LIQUEING	4 = 00	•	40.007	•		•		•		•		•		•	40.007
24 25	373	STREET LIGHTING	A.F.29	\$	49,887	\$	-	\$	-	\$	-	\$	-	\$	-	\$	49,887
25 26		SUBTOTAL - CUSTOMER DIST PLAN	т	\$	1,011,326	Ф	837,333	¢	123,004	¢	16,154	\$	706	Ф	46	\$	34,083
27		- DEMAND DIST PLANT	•	\$	1,540,338	\$	782,375	\$	169,728	\$	445,735	\$	81,364	\$	-	\$	61,137
28		- DEMAND DIOT I EANT		Ψ	1,040,000	Ψ	102,513	Ψ	103,720	Ψ	440,700	Ψ	01,304	Ψ		Ψ	01,107
29		DISTRIBUTION TOTAL		\$	2,551,664	\$	1,619,707	\$	292,732	\$	461,890	\$	82,070	\$	46	\$	95,220
30		BIOTRIBOTION TO THE		Ψ	2,001,004	Ψ	1,010,707	Ψ	202,702	Ψ	401,000	Ψ	02,070	Ψ	40	Ψ	00,220
31		GENERAL PLANT	A.F.35	\$	281,976	\$	145,595	\$	29,711	\$	71,526	\$	17,898	\$	12,052	\$	5,195
32																	
33				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
34																	
35				\$	-	\$	-	\$		\$	<u> </u>	\$	-	\$		\$	
36																	
37		SUBTOTAL PROD,T&D,GEN,COMMON	N PLANT	\$	8,247,150	\$	4,291,564	\$	897,613	\$	2,080,858	\$	493,535	\$	346,596	\$	136,984
38				_		_		_		_		_		_			
39		INTANGIBLE PLANT		\$	48,191		24,883		-,	\$	12,224	\$	3,059		2,060		888
40		EE REGULATORY ASSET	EE tab	\$	(4.250)	\$	(701)	\$	- (1.42)	\$ \$	(245)	\$	(86)	\$	- (50)	\$	(25)
41		REGULATORY ACCOUNT (PENSION A	4 A.F.35	Φ	(1,358)	\$	(701)	\$	(143)	Φ	(345)	\$	(86)	\$	(58)	\$	(25)
42 43		TOTAL NET PLANT		\$	8,293,983	\$	4,315,746	\$	902,547	\$	2,092,738	\$	496,507	\$	348,598	\$	137,847
40		IOIALINEI FLAINI		Ψ	0,233,363	Ψ	4,313,740	Ψ	302,347	Ψ	2,032,130	Ψ	430,307	Ψ	340,390	Ψ	137,047

Electric Cost of Service Allocation Study at Present Rates

Includes MIEC Classification Adjustments and MIEC's Alternative Income Tax Calculation

with Energy Efficiency Costs Removed (Dollars in Thousands)

TITLE: NET OR	IGINAL COST - PAGE 3												
LINE # ACCT #	<u>ITEM</u>	ALLOCATION BASIS	MISSOURI TOTAL (1)	<u>R</u>	ESIDENTIAL (2)	G	SMALL EN SERVICE (3)	_	LARGE G.S./ SM PRIMARY (4)	LARGE <u>PRIMARY</u> (5)	TR	LARGE ANSMISSION (6)	LIGHTING (7)
1	MATERIALS & SUPPLIES - FUEL	A.F.11	\$ 260,508	\$	96,853	\$	25,033	\$	83,362	\$ 26,092	\$	27,882	\$ 1,287
2	MATERIALS & SUPPLIES - LOCAL	A.F.18	\$ 170,308	\$	108,482	\$	19,556	\$	30,290	\$ 5,016	\$	3	\$ 6,961
3	CASH WORKING CAPITAL	A.F.37	\$ 44,894	\$	20,303	\$	4,590	\$	12,651	\$ 3,564	\$	3,301	\$ 485
4	CUSTOMER ADVANCES & DEPOSITS	A.F.12	\$ (19,448)	\$	(10,815)	\$	(4,742)	\$	(3,617)	\$ -	\$	(125)	\$ (149)
5	ACCUM DEFERRED INCOME TAXES	A.F.19	\$ (2,017,383)	\$	(1,056,796)	\$	(219,937)	\$	(503,492)	\$ (117,621)	\$	(82,674)	\$ (36,862)
6													
7	TOTAL NET ORIGINAL COST RATE BA	ASE	\$ 6,732,863	\$	3,473,773	\$	727,048	\$	1,711,931	\$ 413,557	\$	296,985	\$ 109,570

TITLE:	OPERA	ATING EXPENSES - PAGE 1	ALLOCATION			тот	AL MISSOUF	ol .			RESID	ENIT	141		SMALL GE	NI S	EDVICE	IAE	DGE G S	/SM	I PRIMARY		LARGE I	DDIN	/ADV	1.0	RGE TRA	NSN	NOISSIN		LIGH	TING	
LINE #	ACCT #	# ITEM	BASIS		LABOR (1)		OTHER (2)	TO	TAL 3)	L	ABOR (4)		OTHER (5)		LABOR (6)		OTHER (7)	L	ABOR (8)		OTHER (9)	LA	BOR (10)	<u>C</u>	OTHER (11)	L	ABOR (12)	0	THER (13)		ABOR (14)	ОТ	HER 15)
1 2		OPERATING EXPENSES			(.,		(=)	,	-,		(.)		(0)		(0)		(•)		(0)		(0)	,	,,		(,		(.2)		(10)	,	()	(.0,
3 4		PRODUCTION																															
5		OTHER	A.F.1/EE	\$	196,454	\$	169.778	\$ 3	66.232	\$	92,124	\$	79.615	\$	20.925	\$	18.084	\$	55.921	\$	48.328	\$	14.194	\$	12.267	\$	11.866	\$	10.255	\$	1.423	\$	1.230
6		VARIABLE	A.F.11	\$	6,210		941,987		48,198		2,309		-,	\$	597		90,518		1,987		301,433		622			\$	665		100,821				4,655
7																																	
8		SUBTOTAL		\$	202,664	\$	1,111,765	\$ 1,3	14,430	\$	94,433	\$	429,830	\$	21,522	\$	108,602	\$	57,908	\$	349,761	\$	14,816	\$	106,613	\$	12,531	\$	111,075	\$	1,454	\$	5,885
10		SYSTEM REVENUE CREDITS																															
11		OFF-SYSTEM SALES	A.F.11	\$	-	\$	- :	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
12		RENTALS	A.F.2	\$	-	\$		\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
13			SUBTOTAL \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$																														
14		SUBTOTAL		\$	-	\$	- :	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
15		TD																															
16 17			A F 2	¢.	202	e	F 042	e	E 400	•	171	¢.	2 225	æ	44	e	500	•	447	¢.	4.500	¢.	20	•	200	¢.	20	e.	204	•		¢.	0
18			A.F.2 \$ 393 \$ 5,042 \$ 5,436 \$ 174 \$ 2,235 \$ 41 \$ 522 \$ 117 \$ 1,503 \$ 30 \$ 390 \$ 30 \$ 384 \$ 1 \$ 9 A.F.3 \$ 5,591 \$ 41,379 \$ 46,971 \$ 2,478 \$ 18,339 \$ 579 \$ 4,282 \$ 1,667 \$ 12,338 \$ 432 \$ 3,199 \$ 425 \$ 3,149 \$ 10 \$ 71																														
19		300314110113	ANSMISSION LINES A.F.2 \$ 393 \$ 5,042 \$ 5,436 \$ 174 \$ 2,235 \$ 41 \$ 522 \$ 117 \$ 1,503 \$ 30 \$ 390 \$ 30 \$ 384 \$ 1 \$ 9																														
20		TOTAL TRANSMISSION EX	PENSES	\$	5.985	\$	46.422	\$	52.406	\$	2.652	\$	20.574	\$	619	\$	4.804	\$	1.784	\$	13,841	\$	463	\$	3.589	\$	455	\$	3.532	\$	10	\$	80
21		TOTAL TRANSMISSION EX	LINOLO	Ψ	3,303	Ψ	40,422	Ψ	32,400	Ψ	2,002	Ψ	20,574	Ψ	013	Ψ	4,004	Ψ	1,704	Ψ	13,041	Ψ	403	Ψ	3,303	Ψ	400	Ψ	3,332	Ψ	10	Ψ	00
22																																	
23		DISTRIBUTION OPERATING EXP	ENSES																														
24																																	
25																																	
26	582	SUBSTATIONS	A.F.8	\$	2,785	\$	1,469	\$	4,254	\$	1,421	\$	750	\$	307	\$	162	\$	839	\$	442	\$	198	\$	105	\$	-	\$	-	\$	20	\$	11
27 28	E00.4	OVERHEAD LINES																															
26 29	503-1	CUSTOMER	A.F.22	\$	1.019	•	291	œ.	1.309	œ.	846	æ	241	Ф	117	æ	33	•	8	•	2	Φ.	0	•	0	•		\$		•	48	\$	14
30		HV	A.F.23a	\$	405		116		521		207		59		45		13		122		35			\$	8			\$		\$		\$	1
31		PRIMARY	A.F.23b	\$	1,245		355		1,600		648			\$		\$	40		382		109			\$		\$		\$	_	\$	9	\$	3
32		SECONDARY	A.F.24	\$		\$	21			\$		\$		\$		\$	3					\$		\$		\$	-	\$	-	\$	1	\$	0
33		LIGHTING-DIRECT	A.F.25	\$	-	\$		\$		\$		\$	-	\$		\$	-	\$	-	\$		\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
34																																	
35		SUBTOTAL		\$	2,744	\$	783	\$	3,527	\$	1,738	\$	496	\$	312	\$	89	\$	538	\$	154	\$	94	\$	27	\$	-	\$	-	\$	61	\$	17
36																																	
37	583-2	OVERHEAD TRANSFORMERS																															
38		CUSTOMER	A.F.20	\$	1,568		244		1,812		1,366		213		189		29		13		2		-	\$	-	\$	-	\$	-	\$		\$	-
39		SECONDARY	A.F.21	\$	1,179	\$	184	\$	1,363	\$	709	\$	111	\$	153	\$	24	\$	307	\$	48	\$	-	\$	-	\$	-	\$	-	\$	10	\$	2
40		OUDTOTAL		•	0 7 4 7	_	405	•	0.475	_	0.075		0.05		0.45	_			005	•	===			_		•		•		•			
41		SUBTOTAL		\$	2,747	\$	428	\$	3,175	\$	2,075	\$	323	\$	342	\$	53	\$	320	\$	50	\$	-	\$	-	\$	-	\$	-	\$	10	\$	2

TITLE:	OPERA	TING EXPENSES - PAGE 2	ALLOCATIO	NI	7	OTAL MISSOUR) i		RESIDE	ENITIAL	SI.	MALL GEN	I. SERVIC	E 1	APGE G S	/SM PRIMAF	>v	LARGE P	DIMADV	ΙΛĐ	GE TD	ANSMIS	SION		LIGHTIN	NG.
LINE #	ACCT :		BASIS		ABOR (1)	OTHER (2)	TOTAL (3)		BOR 4)	OTHER (5)	LA	ABOR (6)	OTHER (7)		LABOR (8)	OTHER (9)		LABOR (10)	OTHER (11)	LA	BOR 12)	OTF (1:	IER	LAB (14	OR C	OTHER (15)
1 2	584-1	UNDERGROUND LINES			(1)	(2)	(5)	(,	(5)		(0)	(1)		(0)	(3)		(10)	(11)	()	12)	(1.	3)	(1-	•,	(13)
3	004 1	CUSTOMER	A.F.26	\$	1,309	\$ 1,087	\$ 2,396	\$	1,094	\$ 908	\$	151 \$	5 1:	26 \$	11	\$	9 \$	0	\$ 0	\$	-	\$	-	\$	53 \$	44
4		HV	A.F.27a	\$		\$ 41		\$	25			5 \$		5 \$			2 \$	4			-	\$	-	\$	0 \$	0
5		PRIMARY	A.F.27b	\$	357			\$	186		\$	40 \$		33 \$			1 \$	19		\$	-	\$	-	\$	3 \$	2
6		SECONDARY	A.F.28	\$	164	\$ 136	\$ 301	\$	100	\$ 83	\$	21 \$	•	8	42	\$ 3	5 \$		\$ -	\$		\$	<u> </u>	\$	1 \$	1
8		SUBTOTAL		\$	1,881	\$ 1,561	\$ 3,442	\$	1,405	\$ 1,166	\$	218 \$	18	31 \$	177	\$ 14	7 \$	22	\$ 19	\$	-	\$	-	\$	57 \$	48
9 10	E012	UNDERGROUND TRANSFORMERS																								
11	304-2	CUSTOMER	A.F.20	\$	617	\$ (414)	\$ 203	\$	538	\$ (361)	\$	74 9	s (50) \$	5	\$ (4	4) \$		s -	\$	_	\$	_	\$	- \$	-
12		SECONDARY	A.F.21	\$	464				279			60 9		11) \$			1) \$		\$ -	\$	-	\$	-	\$	4 \$	
13																			_			-				
14 15		SUBTOTAL		\$	1,082	\$ (726)	\$ 356	\$	817	\$ (548)	\$	135	\$ (9	90) \$	126	\$ (8	5) \$	-	\$ -	\$	-	\$	-	\$	4 \$	(3)
16	585	LIGHTING		\$	377	\$ 365	\$ 742	\$	- :	\$ -	\$	- \$	-	\$	-	\$ -	\$	-	\$ -	\$	-	\$	-	\$	377 \$	365
17	=00							•	. =		•	0.40								•		•	4.0	_		
18 19	586	METERS	A.F.7	\$	4,152	\$ 13,326	\$ 17,478	\$	2,716	\$ 8,716	\$	840 \$	2,6	95 \$	547	\$ 1,75	6 \$	43	\$ 138	\$	3	\$	10 0	\$	4 \$	12
20	587	CUSTOMER INSTALLATION	DIRECT	\$	1,361	\$ (67)	\$ 1,294	\$	(470)	\$ 23	\$	- 9	-	\$	916	\$ (4	5) \$	916	\$ (45)	\$	-	\$	-	\$	- \$	-
21 22		DIST OPERATING EXPENSE SUBTO	OTAL																							
23		CUSTOMER A582-A587	OTAL	\$	8,666	\$ 14,533	\$ 23,199	\$	6,559	\$ 9,717	\$	1,371	2.8	33 \$	584	\$ 1.76	6 \$	43	\$ 138	\$	3	\$	10	\$	105 \$	70
24		DEMAND A582-A587		\$	8.464				3.143			783		57 \$			4 \$					\$			429 \$	
25																										
26	580	SUPERVISION & ENGR																								
27		CUSTOMER	A.F.30	\$	1,877				1,421		\$	297		'6 \$			8 \$	9		\$		\$	0	\$	23 \$	
28		DEMAND	A.F.31	\$	1,833	\$ 70	\$ 1,904	\$	681	\$ 33	\$	170	•	7 \$	624	\$ 18	8 \$	267	\$ 3	\$		\$		\$	93 \$	10
29 30 31		SUBTOTAL		\$	3,711	\$ 462	\$ 4,173	\$	2,102	\$ 295	\$	467	5 8	33 \$	750	\$ 6	5 \$	276	\$ 7	\$	1	\$	0	\$	116 \$	12
31	581	DISPATCHING																								
33	301	CUSTOMER	A.F.30	\$	2,137	\$ 125	\$ 2,262	\$	1,617	\$ 84	\$	338 \$	6 :	24 \$	144	\$ 15	5 \$	11	S 1	\$	1	\$	0	\$	26 \$	1
34		DEMAND	A.F.31	\$	2,087			\$	775			193		2 \$			6 \$	303		\$	- '	\$	-		106 \$	3
35				_		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·															-				
36 37		SUBTOTAL		\$	4,223	\$ 148	\$ 4,371	\$	2,392	\$ 94	\$	531	5 2	27 \$	854	\$ 2	1 \$	314	\$ 2	\$	1	\$	0	\$	132 \$	4
38	588	MISCELLANEOUS																								
39		CUSTOMER	A.F.30	\$	2,821				2,135			446		78 \$				14			1			\$	34 \$	73
40		DEMAND	A.F.31	\$	2,755	\$ 2,739	\$ 5,494	\$	1,023	\$ 1,270	\$	255	2	70 \$	937	\$ 68	7 \$	401	\$ 110	\$	-	\$	-	\$	140 \$	401
41 42		SUBTOTAL		\$	5,576	\$ 18,013	\$ 23,589	\$	3,158	\$ 11,483	\$	701	3,2	17 \$	1,127	\$ 2,54	3 \$	415	\$ 255	\$	1	\$	10	\$	174 \$	475

TITLE:	<u>OPERA</u>	ATING EXPENSES - PAGE 3	ALLOCATION	1		TOTAL MISSO	JRI			RESID	ENT	TAL	;	SMALL GE	N. :	SERVICE	LAR	GE G. S	s./SM I	PRIMARY	LA	RGE F	RIMAR	Υ	LA	RGE TI	RANS	SMISSION		LIGH	TING
LINE #	ACCT	# ITEM	BASIS		ABOR (1)	OTHER (2)	Ī	OTAL (3)	L	ABOR (4)	Ċ	OTHER (5)	_	LABOR (6)		OTHER (7)	LA	(8)	0	THER (9)	(10)		<u>OTH</u> (11		L	ABOR (12)		OTHER (13)		ABOR (14)	OTHER (15)
1 2 3 4	589	RENTS CUSTOMER DEMAND	A.F.30 A.F.31	\$	-	\$ 392 \$ 70		392 70		-	\$	262 33	\$		\$	76 7	\$	-	\$	48 S	•		\$ \$		\$	-	\$	0	\$		\$ 2 \$ 10
5 6		SUBTOTAL	7	\$	-	\$ 462		462			\$	294			\$	83			\$	65			\$		\$	-	\$	0			\$ 12
7 8 9 10		DIST OPERATING EXPENSE S CUSTOMER A580-589 DEMAND A580-589	UBTOTAL	\$	15,500 15,140	\$ 30,717 \$ 5,507		46,217 20,647		11,732 5,621	\$	20,539 2,554	\$			5,988 543	\$,	\$ \$	3,732 S 1,382 S			\$ \$	291 222	\$	- 5	\$	20	\$		\$ 147 \$ 807
11 12 13		TOTAL DIST OPERATING EXPE	ENSES	\$	30,640	\$ 36,224	\$	66,864	\$	17,353	\$	23,092	\$	3,853	\$	6,531	\$	6,195	\$	5,114	\$ 2	278	\$	513	\$	5	\$	20	\$	954	\$ 954
14 15 16		DISTRIBUTION MAINTENANCE	E EXPENSES																												
17 18 19	591-59	2 SUBSTATIONS	A.F.8	\$	10,466	\$ 6,468	\$	16,934	\$	5,341	\$	3,300	\$	1,155	\$	714	\$	3,151	\$	1,947	\$	745	\$	460	\$	-	\$	-	\$	75	\$ 46
20 21 22 23 24 25	593	OVERHEAD LINES CUSTOMER HV PRIMARY SECONDARY LIGHTING-DIRECT	A.F.22 A.F.23a A.F.23b A.F.24 A.F.25	\$ \$ \$ \$	8,449 3,359 10,326 621	\$ 9,531 \$ 29,301	\$	32,423 12,890 39,627 2,382	\$	7,013 1,714 5,375 312	\$		\$	970 371 1,162 81	\$	3,299 231	\$ \$ \$ \$ \$	68 1,011 3,170 217	\$	193 \$ 2,868 \$ 8,996 \$ 615 \$	5 5	543	\$	1 678 1,540 -		-	\$ \$ \$ \$ \$	- - - -	\$ \$ \$ \$	25 75 11	\$ 1,126 \$ 71 \$ 214 \$ 31 \$ -
26 27 28		SUBTOTAL		\$	22,754	\$ 64,567	\$	87,321	\$	14,413	\$	40,899	\$	2,585	\$	7,335	\$	4,466	\$	12,673	\$	782	\$	2,219	\$	-	\$	-	\$		\$ 1,441
29 30 31 32 33	594	UNDERGROUND LINES CUSTOMER HV PRIMARY SECONDARY	A.F.26 A.F.27a A.F.27b A.F.28	\$ \$ \$			\$	6,920 262 1,888 869	\$ \$	461	\$ \$ \$	3,069 71 522 279	\$	376 14 100 53	\$	425 15 113 60	\$ \$	272	\$	30 \$ 42 \$ 308 \$ 118 \$	5			0 10 53	\$ \$ \$	-	\$ \$ \$	- - -	\$ \$ \$	1 6	\$ 149 \$ 1 \$ 7 \$ 4
34 35 36		SUBTOTAL		\$	4,666	\$ 5,274	\$	9,940	\$	3,486	\$	3,940	\$	542	\$	613	\$	440	\$	498	\$	56	\$	63	\$	-	\$	-	\$	142	\$ 161
37 38 39 40	595	LINE TRANSFORMERS CUSTOMER SECONDARY	A.F.20 A.F.21	\$,	\$ 395	\$	1,174 883	\$	294	\$,	\$	78 64	\$	63 51	\$		\$	4 \$ 103 \$	\$		\$ \$	-	\$	-	\$	-	\$	4	\$ - \$ 3
41 42 43	596	SUBTOTAL		\$	1,139 2,060			2,058 3,058		860	\$	694	\$	142	\$	115	\$	133	\$	107 \$			\$ \$		\$		\$ \$	-	\$		\$ 3 \$ 998
44 45 46	597	METERS	A.F.7	\$	616	\$ 100	\$	716	\$	403	\$	65	\$	125	\$	20	\$	81	\$	13 \$	5	6	\$	1	\$	C	\$	0	\$	1	\$ 0
47 48 49		DIST MAINTENANCE EXPENSE CUSTOMER A593-A597 DEMAND A593-A597	SUBTOTAL	\$	12,963 28,738			41,233 78,793		10,697 13,806		23,491 25,408		1,549 3,000		3,261 5,535		181 8,090		241 \$ 14,997 \$		7 582		3 2,740	\$	-	\$	0			\$ 1,275 \$ 1,374

TITLE:	OPERA ACCT :		ALLOCATION BASIS	LAE	T BOR 1)	OTAL MISSOU OTHER (2)	RI TOTAL (3)		RESIDE BOR 4)	ENTIAL OTHER (5)	LA	MALL GEN BOR (6)	I. SERVICE OTHER (7)		ARGE G. S. LABOR (8)	<u>/SM PR</u> <u>OTH</u> (9)	ER	LARGE LABOR (10)	(MARY OTHER (11)	LARGE LABC (12))R	NSMISSION OTHER (13)	L/	LIGHT ABOR (14)	OTHE (15)	
1 2 3 4 5	590	SUPERVISION & ENGR CUSTOMER DEMAND	A.F.32 A.F.33		651 : 1,443 :	\$ 236	\$ 1,678	\$		\$ 120	\$	78 \$ 151 \$	3 2	5 \$ 6 \$		\$	1 : 71	79			\$		\$ -) \$ \$	114	\$	6
6 7 8	598	SUBTOTAL MISCELLANEOUS		\$	2,094	\$ 369	\$ 2,462	\$	1,230	\$ 230	\$	228 \$	5 4	1 \$	415	\$	72	\$ 80	\$	13	\$	0	\$ () \$	140	\$	12
9 10 11		CUSTOMER DEMAND	A.F.32 A.F.33	\$ \$	295 655				244 315		\$ \$	35 S 68 S		5 \$ 5 \$	4 184	\$ \$	6 393		\$ \$ \$	0 72	1	- 0	\$ \$ -	\$			33 36
12 13 14		SUBTOTAL DIST MAINTENANCE EXPENSE SUB CUSTOMER A590-A598	TOTAL	\$ \$ 1	951 : 13,910 :				559 : 11,478 :			104 \$		1 \$	189 194	•	399		\$ \$ \$	72 3	\$	0) \$) \$	-	\$ \$ 1,3	69
15 16		DEMAND A590-A598		\$ 3	30,836	\$ 51,603	\$ 82,439	\$ 1	14,814	\$ 26,194	\$	3,219	5,70	6 \$	8,681	\$ 1	5,461	1,697	\$	2,825	\$	-	\$ -	\$	2,426	\$ 1,4	117
17 18 19		TOTAL MAINTENANCE OPERATING TOTAL DISTRIBUTION EXPENSES	EXPENSE		44,746 3 75,385 3				26,291 43,645			4,881 \$ 8,734 \$		8 \$	8,875 15,070		5,709 : 0,822 :			2,828 3,341		6			2,993 3.948	\$ 2,7	
			LLOCATION			OTAL MISSOU			RESIDE				I. SERVICE		ARGE G. S.			LARGE					NSMISSION		LIGHT		
1 2 3	ACCT :		<u>BASIS</u>		<u>BOR</u> 1)	OTHER (2)	<u>TOTAL</u> (3)		<u>3OR</u> 4)	OTHER (5)		<u>BOR</u> (6)	OTHER (7)	<u>!</u>	(8)	<u>OTH</u> (9)		(10)	<u>c</u>	<u>OTHER</u> (11)	(12)		<u>OTHER</u> (13)		(14)	OTHE (15)	
3 4 5 6 7 8 9 10	902 905 903 904 903	METER READING MISCELLANEOUS CUSTOMER RECORDS UNCOLLECTIBLE ACCOUNTS CREDIT AND COLLECTION INTEREST ON SURETY DEPOSITS	A.F.7A A.F.7A A.F.40 A.F.13 A.F.13 A.F.12	\$	89 6 6 6,132 - 9 1,904	\$ 192 \$ 7,568 \$ 15,572 \$ 2,350	\$ 197 \$ 13,700 \$ 15,572	\$ \$ \$ \$	1,677	\$ 165 \$ 5,671 \$ 13,717	\$ \$ \$	11 3 1 3 349 3 - 3 110 5	93 93 90 13	8 \$ 3 \$ 9 \$ 3 \$ 6 \$ 6 \$ 5		\$	137 3 918 845 128 134	5 5 5 8	\$ \$ \$ \$		\$		\$ (\$ - \$ -	2 \$ 0 \$ 0 \$ \$ \$ \$ \$	5	\$ \$ \$	9 0 35 43 7 6
12 13 14	901	SUBTOTAL SUPERVISION	A.F.34		8,130 S		\$ 42,413 \$ 1,643		6,614 1,329		\$ \$	471 \$ 95 \$		5 \$ 1 \$		\$	2,166		\$ \$ \$		\$	0		7 \$			00
15 16 17	501	TOTAL CUSTOMER ACCOUNT EXPE		-	9,764	<u> </u>			7,943		-	565		6 \$	1,147	-	2,166		\$ \$	95		0		7 \$			100

19 20		CUSTOMER SERVICE & SALES EXPE	<u>ENSES</u>																								
21 22	908-1&90 908-916	RCS CUSTOMER SERVICES & SALES	DIRECT A.F.34	\$	- 10,154	\$ - \$ 5,584	\$ - \$ 15,737	\$ \$	- \$ 8,260 \$		- \$		\$ \$		Ψ	- \$ 193 \$		Ψ	. \$ 17 \$		\$		\$ \$	- \$		96 \$	
23 24		SUBTOTAL		\$	10,154	\$ 5,584	\$ 15,737	\$	8,260 \$	\$ 4,6	§91 \$	588	\$	507	\$ 1,1	193 \$	353	\$	17 \$	16	\$	0	\$	1 \$	\$	96 \$	16
25 26	907-911	SUPERVISION	A.F.38	\$	30	\$ 3	\$ 33	\$	24 \$	\$	3 \$	2	\$	0	\$	3 \$	0	\$	0 \$	0	\$	0	\$	0 \$	\$	0 \$	0
27 28 29		TOTAL CUSTOMER SERVICE & SAL	ES EXPENS	i \$	10,183	\$ 5,587	\$ 15,770	\$	8,284 \$	4,6	694 \$	589	\$	508	\$ 1,1	197 \$	353	\$	17 \$	16	\$	0	\$	1 \$	\$	96 \$	16
30 31		TOTAL PROD, T&D,CUST EXPENSE	S	\$	303,982	\$ 1,315,037	\$ 1,619,019	\$	156,957 \$	557,4	109 \$	32,030	\$	132,628	\$ 77,1	107 \$	386,944	\$ 19,2	294 \$	113,654	\$	12,992	\$ 1	114,636 \$	5,6	601 \$	9,767
32 33 34		A & G EXPENSES																									
35 36		EPRI OTHER	A.F.14 A.F.35	\$ \$	- 43,253	\$ 2,513 \$ 236,744			- \$ 22,333 \$		033 \$ 240 \$		\$ \$		\$ 10,9	Ψ	767 60,052	\$ - \$ 2,7	Ψ				\$ \$	214 \$ 10,118 \$. \$ '97 \$	
37 38		SUBTOTAL	71.1 .00	\$		\$ 239,257			22,333 \$				\$			971 \$			45 \$			1,849		10,333			4,379
39 40		TOTAL PROD,T&D,CUST,A&G EXPEN	NSES	•	347,234		\$ 1,901,528		,		681 \$		•	157,833		779 \$			45 \$ 040 \$			14,841		124,969			
TITLE: (OPERATI	NG EXPENSES - PAGE 6 A	LLOCATION			TOTAL MISSO			RESIDE			SMALL GE					M PRIMARY			RIMARY		RGE TRA				IGHTI	
LINE #	ACCT #	<u>ITEM</u>	BASIS	L	ABOR (1)	OTHER (2)	(3)	Ī	(4)	OTHER (5)	2	(6)	<u>C</u>	(7)	LABOI (8)	<u>R</u>	OTHER (9)	(10)	<u> </u>	OTHER (11)		ABOR (12)		<u>HER</u> 13)	(14)		OTHER (15)
1 2		DEPREC & AMORTIZATION EXPENS	<u>ES</u>																								
3 4		DEPR-PRODUCTION PLANT	A.F.1	\$	-	\$ 230,672 \$			- \$				\$		\$	- \$		\$ -	- \$	16,667			\$	13,933		- \$.,
5 6		DEPR-COMMON PLANT DEPR-TRANSMISSION PLANT	A.F.1 A.F.17	\$	-	\$ 16,797			- \$ - \$	7,4	- \$ 145 \$	-	\$	1,738	\$	- \$ - \$	5,008	\$ - \$ -	· \$	1,299	\$	-	\$	1,278	\$ -	Ψ	29
7 8		DEPR-DISTRIBUTION PLANT DEPR-GENERAL PLANT	A.F.18 A.F.35	\$ \$		\$ 149,832 \$ 49,775			- \$ - \$				\$ \$,	7	- \$ - <u>\$</u>		\$ - \$ -		4,413 3,159	\$ \$		\$ \$	2 \$ 2,127 \$		Ψ.	
9 10		SUBTOTAL		\$		\$ 447,077	\$ 447,077	\$	- \$	236,7	756 \$	-	\$	48,758	\$	- \$	109,943	\$ -	- \$	25,538	\$		\$	17,341 \$	\$ -	. \$	8,741
11 12				\$		\$ -	\$ -	\$	\$		\$		\$		\$	\$	-	\$ -	<u> </u>		\$		\$	- \$	\$ -	<u> </u>	
13 14 15		TOTAL DEPREC & AMORTIZ EXPENS	SES	\$	-	\$ 447,077	\$ 447,077	\$	- \$	236,7	756 \$	-	\$	48,758	\$	- \$	109,943	\$ -	- \$	25,538	\$	-	\$	17,341 \$	\$ -	. \$	8,741
16 17 18		OTHER																									
19 20		REAL ESTATE & PROPERTY TAXES	A.F.19	\$		\$ 142.152	\$ 142.152	e	- \$	5 74.4	166 \$		\$	15.498	•	- \$	35,478	¢ .	- \$	8.288	\$		\$	5.826 \$	• -	. \$	2,597
21		INCOME/CITY EARNINGS TAXES	A.F.29	\$	-	\$ 96,527	\$ 96,527	\$	- \$	13,3	330 \$	-	\$	16,036	\$	- \$	50,405	\$ -	. \$	10,879	\$	-	\$	5,693	\$ -	. \$	183
22 23		RETURN	A.F.29	\$	-	\$ 572,055 \$ 23.042			- \$		148 \$		\$			- \$ - \$		\$ -	Y					25,233 \$ 985 \$			
23 24		PAYROLL TAXES ENVIRONMENTAL TAX	A.F.35 A.F. 1	\$ \$	-	\$ 23,042 \$ -	\$ 23,042 \$ -	\$	- \$ - \$, .	397 \$ - \$		\$ \$, .	\$		5,845 -	\$ - \$ -	- \$ - \$	1,463	\$		\$ \$	985 \$		· \$	
25 26		SUBTOTAL		\$	-	\$ 833,776	\$ 833,776	\$	- \$	394,8	341 \$		\$	95,735	\$	- \$	237,181	\$ -	. \$	55,768	\$	-	\$	37,736 \$	\$ -	. \$	12,515
27 28 29		TOTAL OPERATING & OTHER EXPEN	NSES	\$	347,234	\$ 2,835,147	\$ 3,182,381	\$	179,290 \$	1,312,2	278 \$	36,587	\$	302,326	\$ 88,0	79 \$	794,887	\$ 22,0)40 \$	210,208	\$	14,841	\$ 1	180,046 \$	6,3	398 \$	35,401
30 31																											
32 33		TOTAL COST OF SERVICE		\$	347,234	\$ 2,835,147	\$ 3,182,381	\$	179,290 \$	1,312,2	278 \$	36,587	\$	302,326	\$ 88,0	79 \$	794,887	\$ 22,0)40 \$	210,208	\$	14,841	\$ 1	180,046 \$	6,3	398 \$	35,401

Class Cost of Service Study Results and Revenue Adjustments to Move Each Class to Cost of Service Using MIEC's Modified ECOS at Present Rates with Energy Efficiency Costs Removed

(Dollars in Thousands)

Line	Rate Class	 Base Revenues (1)	Current Rate Base (2)	C	Adjusted operating Income (3)	Earned ROR (4)	Indexed ROR (5)	ncome @ qual ROR (6)	fference Income (7)	Revenue ncrease (8)	Percent Increase (9)
1	Residential	\$ 1,170,105	\$3,473,773	\$	146,222	4.209%	71	\$ 205,612	\$ 59,391	\$ 95,863	8.2%
2	Small Gen. Service	288,054	727,048		52,174	7.176%	121	43,034	(9,140)	(14,753)	-5.1%
3	Large G.S. / Sm Primary	749,850	1,711,931		143,441	8.379%	142	101,329	(42,112)	(67,974)	-9.1%
4	Large Primary	189,820	413,557		32,539	7.868%	133	24,478	(8,061)	(13,011)	-6.9%
5	Large Transmission	147,949	296,985		19,915	6.706%	113	17,579	(2,337)	(3,772)	-2.5%
6	Lighting	 34,380	109,570		4,226	3.857%	65	6,485	 2,259	 3,647	10.6%
7	Total	\$ 2,580,158	\$6,732,863	\$	398,518	5.919%	100	\$ 398,518	\$ -	\$ -	0.0%

Cost-Effectiveness Test Summary

MEEIA Implementation				
Plan 2013-2015	TRC	UCT	PCT	RIM
RES-Lighting	3.66	6.01	10.18	0.56
RES-Efficient Products	1.55	3.90	2.85	0.62
RES-HVAC	2.11	4.61	2.63	0.94
RES-Refrigerator Recycling	2.23	2.93	11.67	0.63
RES-HEP	1.64	3.00	3.11	0.68
RES-New Homes	1.26	1.77	3.61	0.57
RES-Low Income	0.84	0.84	2.85	0.43
RES-TOTAL	2.24	4.00	4.52	0.68
Bus-Standard	2.14	3.15	4.10	0.75
BUS-Custom	1.77	3.55	2.62	0.82
BUS-RCx	1.70	3.77	2.51	0.79
BUS-New Construction	1.36	2.22	2.42	0.71
BUS-TOTAL	1.85	3.33	2.98	0.79
PORTFOLIO TOTAL	2.07	3.71	3.86	0.72

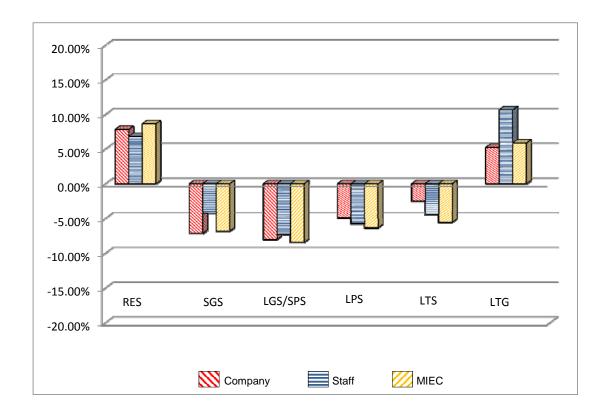
Note: Data in table reflects cost-based values calculated using DSMore.

Source: Ameren Missouri MEEIA Report, Page 43.

AMEREN MISSOURI

Comparison of the Class Cost of Service Results Percent Change in Class Revenues Required to Equalize Rate of Return at Present Rates (Revenue Neutral)

LINE NO.	DESCRIPTION	RES (1)	SGS (2)	LGS/SPS (3)	LPS (4)	LTS (5)	LTG (6)
1	Company	7.83%	-7.13%	-7.99%	-4.88%	-2.49%	5.22%
2	Staff	6.81%	-4.20%	-7.28%	-5.73%	-4.43%	10.67%
3	MIEC	8.63%	-6.78%	-8.45%	-6.31%	-5.54%	5.87%



Sources:

Company: Ameren's ECOS study modified to reflect income taxes at present rates;

Schedule MEB-COS-6.

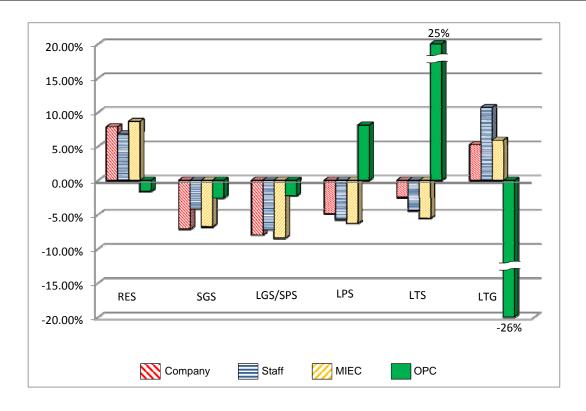
Staff: Workpaper "Staff CCOS - Ameren Missouri.xlsx", tab "Table 2".

MIEC: Schedule MEB-COS-5

AMEREN MISSOURI

Comparison of the Class Cost of Service Results Percent Change in Class Revenues Required to Equalize Rate of Return at Present Rates (Revenue Neutral)

LINE NO.	DESCRIPTION	RES (1)	SGS (2)	LGS/SPS (3)	LPS (4)	LTS (5)	LTG (6)
1	Company	7.83%	-7.13%	-7.99%	-4.88%	-2.49%	5.22%
2	Staff	6.81%	-4.20%	-7.28%	-5.73%	-4.43%	10.67%
3	MIEC	8.63%	-6.78%	-8.45%	-6.31%	-5.54%	5.87%
4	OPC	-1.62%	-2.58%	-2.27%	8.09%	24.99%	-25.72%



Sources:

Company: Ameren's ECOS study modified to reflect income taxes at present rates;

Schedule MEB-COS-6.

Staff: Workpaper "Staff CCOS - Ameren Missouri.xlsx", tab "Table 2".

MIEC: Schedule MEB-COS-5

OPC: Workpaper "RevisedwS A&4CP BAM WP CCOS w CC ER-2012-0166-HC.xlsx",

tab "Schedule BAM Direct-1", Row 39.