209

Exhibit No.:

Issues:

Fuel and Purchased Power

Witness:

David W. Elliott

Sponsoring Party:

MO PSC Staff

Type of Exhibit:

Rebuttal Testimony

File No.:

ER-2011-0028

Date Testimony Prepared:

March 25, 2011

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May 10, 201

May 10, 2011 Data Center Missouri Public

Service Commission

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

DAVID W. ELLIOTT

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

FILE NO. ER-2011-0028

Jefferson City, Missouri March 2011

Staff Exhibit No. 209

Date 4/26/1 Reporter & B

File No. £2-2011-0028

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a AmerenUE's Tariff to Increase Its Annual Revenues for Electric Service) File No. ER-2011-0028			
AFFIDAVIT OF DAVID W. ELLIOTT				
STATE OF MISSOURI)) ss COUNTY OF COLE)				
David W. Elliott, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.				
	David W. Elliott			
Subscribed and sworn to before me this 24 day of March, 2011.				
SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086	Susan Mundermeyer Notary Public			

1		REBUTTAL TESTIMONY
2		OF
4 5		DAVID W. ELLIOTT
6 7 8		UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI
9		
10 11		FILE NO. ER-2011-0028
12 13	Q.	Please state your name.
14	A.	David W. Elliott.
15	Q.	Are you the same David W. Elliott that contributed to Staff's Cost of Service
16	Report previously filed in this case?	
17	A.	Yes, I am.
18	Q.	What is the purpose of your rebuttal testimony?
19	A.	The purpose of my rebuttal testimony is to provide the Staff's updated
20	production cost simulation results reflecting the use of 2010 unit operating data to calculate	
21	normalize inputs to the production cost model, and the revised market prices.	
22	Q.	What are the results of Staff's revised production cost simulations?
23	A.	The results indicate that the appropriate level of annual fuel and purchased
24	power cost f	for Ameren Missouri is \$456,029,583 with off-system sales, and \$633,536,008
25	without off-s	system sales. This is an increase of \$11,601,873 (2.6%) for fuel cost with off-
26	system sales and a decrease of \$537,136 (0.085%) without off-system sales for fuel cost from	
27	Staff's direct filing.	
28	Q.	What production cost model inputs were affected?

Rebuttal Testimony of David W. Elliott

	David W. Em	
1	A.	The planned maintenance hours, the forced outage factors, and the unit
2	capacities.	
3	Q.	What period of data did you use?
4	A.	I used the six years of unit operating data ending December 31, 2010, which
5	replaced the s	six years of operating data ending December 31, 2009.
6	Q.	What was the update to the market prices?
7	A.	Staff witness, Erin L. Maloney describes the update to market prices in her
8	rebuttal testin	nony.
9	Q.	Does this conclude your rebuttal testimony?
10	A.	Yes, it does.