

Ameren's Response to  
OPC Data Request  
MPSC Case No. ER-2008-0318  
AmerenUE's Tariff Filing to Increase Rate for Electrical Service  
Provided to Customers in the Company's Missouri Service Area

Requested From: Bill Dunkel

Data Request No. OPC 5032

Starting on page 5, line 23 the Rebuttal Testimony of Mr. Wiedmayer states:

"Mr. Dunkel's adjustment is not appropriate since it ignores the possibility that the depreciation rates for other plant accounts may increase, which may reduce or eliminate his adjustment entirely."

(a) Provide the analysis that shows that if the parameters adopted by the Commission in Case No. ER-2007-0002 are used, that if "Mr. Dunkel adjustment" (amortizing the variances between the calculated (theoretical) accrued depreciation and the book accumulated depreciation over the composite remaining life of the asset) were applied to all accounts, that would "reduce or eliminate his adjustment entirely." In this response specifically use the parameters adopted by the Commission in Case No. ER-2007-0002, including the life parameters for the Steam Production plant as adopted by the Commission in Case No. ER-2007-0002.

(b) On page 19, footnote 28 of his Direct testimony, Mr. Dunkel states:  
"Based on data from the prior case, for the non-nuclear accounts in total, using the parameters adopted by the Commission in Case No. ER-2007-0002, and using the actual reserves instead of the theoretical reserves would most likely result in a lower total depreciation expense for the non-nuclear accounts than results from the current rates, so not adjusting the non-nuclear accounts in this case is conservative, and very likely is beneficial to AmerenUE."

Is it a correct statement, using the parameters adopted by the Commission in Case No. ER-2007-0002, that amortizing the variances between the calculated (theoretical) accrued depreciation and the book accumulated depreciation over the composite remaining life of the asset for the non-nuclear power plants, transmission, distribution and general plant would result in a lower total depreciation expense for non-nuclear power plants, transmission, distribution, and general plant than results from the current rates? If this is not a correct statement, provide the corrected statement.

(c) Is it a correct statement that the total book reserve amount for the non-nuclear power plants, transmission, distribution, and general plant accounts is larger than the total theoretical reserve amount for those same accounts with the theoretical reserve calculated using the current approved depreciation rates? If this is not a correct statement, provide the corrected statement and the support for the corrected statement.

(d) In the prior case, Case No. ER-2007-0002, data as of 12/31/2005 was used. As of 12/31/2005 provide the book reserve amount separately for the nuclear production plant, non-nuclear power plants, transmission, distribution and general plant accounts.

(e) Using data through 12/31/2005 provide the theoretical reserve amount separately for the

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nuclear production plant , non-nuclear production plants, transmission, distribution and general plant accounts with the theoretical reserve calculated using the depreciation rates approved by the Commission in Case No. ER-2007-0002.

- (f) Provide the most recent analysis that AmerenUE or Mr. Wiedmayer has which shows the theoretical reserve separately for the nuclear production plant, the non-nuclear production plants, transmission, distribution and general plant accounts, with the theoretical reserve calculated using the currently approved depreciation parameters.
- (g) As of the same date for the data provided in response to part (f) of this request, provide the book reserve amount for the separately for the nuclear production plant , non-nuclear power plants, transmission, distribution and general plant accounts.
- (h) If available, also provide the information requested in parts (d) through (g) by account.

Response:

- (a) No such calculations exist. The company's depreciation expense for this proceeding was determined using the Commission approved rates multiplied by the plant balance.
- (b) No such calculations exist. The company's depreciation expense for this proceeding was determined using the Commission approved rates multiplied by the plant balance.
- (c) No such calculations exist. The company's depreciation expense for this proceeding was determined using the Commission approved rates multiplied by the plant balance.
- (d) Refer to Schedule JFW-E2, pages 6 through 11, of my rebuttal testimony in Case number ER-2007-0002.
- (e) No such calculations exist. In Case Number ER-2007-0002 the Commission did not allow adjustments to depreciation related to the reserve imbalance.
- (f) No such calculations exist. The company's depreciation expense for this proceeding was determined using the Commission approved rates multiplied by the plant balance.
- (g) No such calculations exist. The company's depreciation expense for this proceeding was determined using the Commission approved rates multiplied by the plant balance.
- (h) No such calculations exist.

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Date: November 5, 2008