Union Electric Company d/b/a Ameren Missouri
Case No. ER-2011-0028

LIST OF ISSUES

The following contested issues are before the Commission for resolution:

1. Overview and Policy:

A. What "cost of service" and/or regulatory policy considerations, if any, should guide the Commission's decision of the issues in this case?

B. Can the Commission consider and rely on the testimony of ratepayers at local public hearings in determining just and reasonable rates? If so, how should the Commission take this testimony into account, if at all?[1]

C. Staff's response to questions concerning its Revenue Requirement Cost-of-Service Report.

Warner L. Baxter (Ameren Missouri)
Steve Rackers (Staff)
Barbara Meisenheimer (OPC)

2. Storm Costs/Vegetation-Infrastructure Trackers

A. Vegetation-Infrastructure:

(1) Should the Commission authorize Ameren Missouri to continue the current tracking mechanism for vegetation management and infrastructure inspections?

B. Storm Costs:

(1) How should the Commission calculate Ameren Missouri's normalized, non-labor storm costs to be included in the revenue requirement for ratemaking purposes?

(2) Should the difference between the amount of non-labor storm costs that Ameren Missouri incurred during the true-up period and the normalized level of non-labor storm costs included in the revenue requirement for ratemaking

[1] The Company agrees the Commission can consider ratepayer testimony from local public hearings. The Company does not believe this is an "issue" that requires any resolution by the Commission in this case or that properly belongs on the "list of issues."

purposes be amortized over five (5) years or should that difference be included in the normalized costs used for ratemaking purposes?

Lynn M. Barnes (Ameren Missouri)
Dave Wakeman (Ameren Missouri)
John Cassidy (Staff)
Steve Rackers (Staff)
Greg Meyer (MIEC)

3. Sioux Scrubbers: Should the Commission allow in rate base $31 million in cost increases ($18 million in construction costs and $13 million in AFUDC) that were incurred as a result of Ameren Missouri's decision to temporarily suspend construction of the Sioux Plant Wet Flue Gas Desulfurization Project due to the Company's concerns about conditions in the financial markets during the period commencing in late 2008 and continuing into early 2009?

Mark C. Birk (Ameren Missouri)
Jerre Birdsong (Ameren Missouri)
Dave Murray (Staff)
Robert Grissum (Staff)

4. Energy Efficiency/Demand Side Management (DSM):

A. Is Ameren Missouri in compliance with the Missouri Energy Efficiency Investment Act (MEEIA) regardless of whether or not proposed rules under the law are effective?

(1) What DSM programs should Ameren Missouri continue and/or implement, and at what annual expenditure level; and

(2) Should Ameren Missouri continue to ramp up its demand side management programs to pursue all cost-effective demand side savings?

B. Does Ameren Missouri's request for demand-side management programs' cost recovery in this case comply with MEEIA requirements?

(1) Should the Commission approve a cost recovery mechanism for Ameren Missouri DSM programs as part of this case? If so,

(a) Over what period should DSM program costs incurred after December 31, 2010, be amortized?

(b) Should the mechanism include an adjustment to kWh billing determinants?

(c) How much should the Commission reduce the billing determinants? and

(d) If billing units are adjusted for demand side savings, how should the NBFC rates be calculated?

C. Should a portion of the low income weatherization program funds be utilized to engage an independent third party to evaluate the program?

Richard Mark (Ameren Missouri)
Dan Laurent (Ameren Missouri)
William Davis (Ameren Missouri)
John Rogers (Staff)
Maurice Brubaker (MIEC)
Laura Wolfe (MDNR)
Ryan Kind (OPC)

5. Taum Sauk: What amount, if any, of Ameren Missouri's investment related to the reconstruction of Taum Sauk should be included in rate base for ratemaking purposes?

Mark C. Birk (Ameren Missouri)
Paul C. Rizzo (Ameren Missouri)
Erin Carle (Staff)
Guy Gilbert (Staff)
Ryan Kind (OPC)

6. Municipal Lighting: What is the appropriate ratemaking treatment for Ameren Missouri's street lighting classes in this case?

Philip Difani (Ameren Missouri)
Mike Scheperle (Staff)
Petree Eastman (Municipals)

7. Cost of Capital: What return on equity should be used to determine Ameren Missouri's revenue requirement in this case?

Robert B. Hevert (Ameren Missouri)
Dave Murray (Staff)
Billie LaConte (MEG)
Michael Gorman (MIEC)

8. Fuel Adjustment Clause Issues:

A. Should the Commission authorize Ameren Missouri to continue its current Fuel Adjustment Clause (FAC) or should the Commission discontinue or order modifications to the FAC?[2]

B. Should the sharing percentage in Ameren Missouri's FAC be changed from 95/5 percent to 85/15 percent?

C. Should the length of the recovery periods for the FAC be reduced from twelve (12) months to eight (8) months?

D. Should the Company have the ability to adjust the FPAC rate for errors in calculations that may have occurred since the FAC Rider was granted to Ameren Missouri?

E. What is the appropriate tariff language to reflect any modifications or clarifications to Ameren Missouri's FAC?

Lynn M. Barnes (Ameren Missouri)
Jaime Haro (Ameren Missouri)
Mark C. Birk (Ameren Missouri)
Gary Rygh (Ameren Missouri)
Steve Wills (Ameren Missouri)
Lena Mantle (Staff)
David Roos (Staff)
Ryan Kind (OPC)
Maurice Brubaker (MIEC)
James R. Dauphinais (MIEC)

9. LED Lighting: Should the Commission order Ameren Missouri, not later than twelve (12) months following the effective date of the Report & Order in this case, to complete its evaluation of LED SAL systems, and, based on the results of that evaluation, either file a proposed LED lighting tariff(s) or indicate why such tariff(s) should not be filed?

Hojong Kang (Staff)
Wilbon C. Cooper (Ameren Missouri)
Kyle Shoff (Ameren Missouri)

[2] The Company does not believe that this issue has properly been raised in this case, nor that it is an issue that requires resolution by the Commission in this case. Other parties disagree.

10. Solar Rebates Accounting Authority Order (AAO):

A. What is the appropriate method -- RESRAM or an Accounting Authority Order (AAO) -- for Ameren Missouri to recover the costs it incurs for compliance with the Missouri Renewable Energy Standard (RES) after the true-up date in this case (February 28, 2011)?

B. If the Commission determines that an AAO is appropriate, should the Company be authorized in this case to implement an AAO to recover the costs it incurred for compliance with the RES before the true-up date in this case?

C. What amount of solar rebate costs should Ameren Missouri be allowed to include in the revenue requirement used to set rates in this case?

Gary S. Weiss (Ameren Missouri)
Mike Taylor (Staff)
Maurice Brubaker (MIEC)
Laura Wolfe (MDNR)

11. Union Issues:

A. Does the Commission have the authority to order Ameren Missouri to do the following:

(1) Institute or expand its training programs within specified time periods as a means of investing in its employee infrastructure?

(2) Hire specific additional personnel within specified time periods as a means of investing in its employee infrastructure

(3) Submit to a tracker for its energy delivery distribution system?

(4) Submit to a tracker to address the need and efforts to replace the aging workforce?

(5) Expend a substantial portion of the rate increase from this proceeding on investing and re-investing in its regular employee base in general, including hiring, training and utilizing its internal workforce to maintain its normal and sustained workload?

(6) Use a portion of the rate increase from this proceeding to replace equipment, wires and cable which have out lived their anticipated life?

B. If the Commission does have the authority, should it order Ameren Missouri to take one or more of the steps listed above?

Michael Walter (Unions)

Dave Wakeman (Ameren Missouri)

12. Property Tax:

A. What amount of property tax expense relating to the Sioux Scrubbers and the Taum Sauk additions the Company seeks to put in rate base in this case should the Commission include in Ameren Missouri's revenue requirement for ratemaking purposes?

B. Should the Commission order Ameren Missouri to return to its customers any reductions that the Company receives in its 2010 property taxes?

Gary Weiss (Ameren Missouri)
Steve Rackers (Staff)
Greg Meyer (MIEC)

13. Rate Design/Class Cost of Service

A. Class Cost of Service:

(1) Which of the proposed class cost of service methodologies – the 4 NCP–A&E methodology, the Base Intermediate-Peak methodology, or the 4P-P&A methodology – should the Commission use in this case to allocate Ameren Missouri's investment and costs among the Company's various rate classes?

(2) What methodology should the Commission use in this case to allocate Ameren Missouri's fixed production plant investment and operation and maintenance costs?

B. Rate Design:

(1) To what extent should the Commission rely on the results of a class cost of service study in apportioning revenue responsibility among Ameren Missouri's customer classes in this case?

(2) What amount of increase or decrease in the revenue responsibilities of Ameren Missouri's customer classes should the Commission order in this case?

(3) What is the appropriate monthly residential customer charge that should be set for Ameren Missouri in this case?

(4) Should AmerenMO be required to eliminate declining block rates for the residential winter energy charge? If so, should the declining block rates be eliminated in a revenue neutral manner?

Wilbon C. Cooper (Ameren Missouri)
William Warwick (Ameren Missouri)
Mike Scheperle (Staff)
Ryan Kind (OPC)
Barbara Meisenheimer (OPC)
Maurice Brubaker (MIEC)
Laura Wolfe (MDNR)
Kip Smith (Noranda)
Henry Fayne (Noranda)