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*Issues:* *Transmission-Staff Conditions*  
*for Approval*  
*Witness:* *Mark L. Oligschlaeger*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *EO-2003-0271*  
*Date Testimony Prepared:* *May 2, 2003*

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**MARK L. OLIGSCHLAEGER**

**UNION ELECTRIC COMPANY  
D/B/A AMEREN UE**

**CASE NO. EO-2003-0271**

*Jefferson City, Missouri*  
*May 2003*

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In re: Application of Union Electric Company     )  
for Authority to Participate in the Midwest     )  
ISO through a Contractual Relationship     )  
with GridAmerica     )

**Case No. EO-2003-0271**

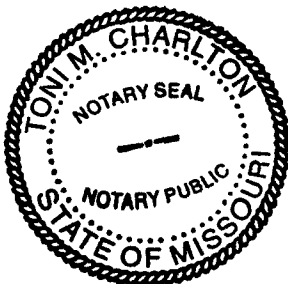
**AFFIDAVIT OF MARK L. OLIGSCHLAEGER**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

Mark L. Oligschlaeger, being 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 14 pages 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 and correct to the best of his knowledge and belief.

Mark L. Oligschlaeger  
Mark L. Oligschlaeger

Subscribed and sworn to before me this 2nd day of May 2003.



Toni M. Charlton

TONI M. CHARLTON  
NOTARY PUBLIC STATE OF MISSOURI  
COUNTY OF COLE  
My Commission Expires December 28, 2004

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**MARK L. OLIGSCHLAEGER**  
**UNION ELECTRIC COMPANY**  
  
**d/b/a AmerenUE**  
  
**CASE NO. EO-2003-0271**

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**REBUTTAL TESTIMONY**  
**OF**  
**MARK L. OLIGSCHLAEGER**  
**UNION ELECTRIC COMPANY**  
**d/b/a AmerenUE**  
**CASE NO. EO-2003-0271**

Q. Please state your name and business address.

A. Mark L. Oligschlaeger, P.O. Box 360, Jefferson City, MO 65102.

Q. Please describe your educational background and work experience.

A. I attended Rockhurst College in Kansas City, MO, and received a Bachelor of Science degree in Business Administration with a major in Accounting in 1981. The Missouri Public Service Commission (Commission) has employed me as a Regulatory Auditor since September 1981 within the Accounting Department. In November 1981, I passed the Uniform Certified Public Accountant (CPA) examination and, since February 1989, I have been licensed in the state of Missouri as a CPA.

Q. Have you previously filed testimony before this Commission?

A. Yes, numerous times. A listing of the cases in which I have previously filed testimony before the Commission is given in Schedule 1, which is attached to this rebuttal testimony. Schedule 2 to this testimony lists the subjects, by proceeding, on which I have submitted testimony in Commission proceedings from 1990 onward.

Q. With reference to Case No. EO-2003-0271, have you examined the books and records of Union Electric Company, d/b/a AmerenUE (UE)?

A. Yes, with the assistance of other members of the Commission Staff.

1 Q. What is the purpose of your rebuttal testimony?

2 A. The purpose of this testimony is to address certain aspects of UE's application  
3 to participate in the Midwest Independent Transmission System Operator, Inc. (MISO or  
4 Midwest ISO), through a contractual arrangement with GridAmerica LLC (GridAmerica).  
5 GridAmerica is an affiliate of National Grid, and GridAmerica will operate as an  
6 "independent transmission company." (The relationship between UE, GridAmerica and  
7 MISO will be discussed in more detail in the rebuttal testimony of Staff witness  
8 Michael S. Proctor of the Economic Analysis section of the Energy Department.) In  
9 particular, I reviewed the four agreements (MISO ITC Agreement, LLC Agreement, Master  
10 Agreement, and Operation Agreement) that variously concern GridAmerica, MISO and the  
11 three current transmission owners (UE, First Energy Corp., Northern Indiana Public Service  
12 Company) (Transmission Owners or GridAmerica Participants) that plan to transfer  
13 functional control of their transmission assets to GridAmerica. Each of these agreements is  
14 attached as schedules to the direct testimony of Company witness Daniel J. Godar.

15 Specifically, I will address the following topics in this rebuttal testimony:  
16 1) transmission rate "pancaking" and "lost revenues;" 2) possible divestiture of transmission  
17 assets to GridAmerica by UE; 3) possible "securitization" treatment of UE transmission  
18 revenues; and 4) accounting requirements associated with UE's membership in MISO.

19 **RATE "PANCAKING"**

20 Q. What is rate "pancaking?"

21 A. As it applies to electric transmission transactions, rate "pancaking" occurs  
22 when a purchaser of electric power pays a charge for "through and out" transmission service  
23 to the owner of each transmission system through which the electricity is deemed to flow

1 before becoming available to the purchaser. Because of the significant transmission charges  
2 normally resulting from long distance power transactions, pancaking has the impact of  
3 making otherwise beneficial generation transactions uneconomical to the possible parties. As  
4 a consequence, the initiatives by the FERC since the mid-1990s to foster viable wholesale  
5 generating markets in this country have included limitations on or the elimination of  
6 transmission rate pancaking.

7 Q. Does UE currently receive a benefit from the practice of transmission rate  
8 pancaking?

9 A. Yes. As generally described in the direct testimony of Company witness  
10 David C. Linton, in recent years UE has received significant levels of revenues associated  
11 with “through and out” transmission transactions. “Through and out” transactions are those  
12 instances in which power is considered to flow through a utility’s transmission lines, and the  
13 transaction does not terminate in that utility’s system.

14 Q. Do all Missouri utilities and their customers benefit from the practice of  
15 transmission rate pancaking?

16 A. Not necessarily. Because “through and out” transmission revenues are  
17 included in the calculation of Missouri electric revenue requirements, the higher the level of  
18 this revenue category, the lower the revenue requirement that needs to be recovered from  
19 Missouri retail electric customers. Therefore, the customers of utilities whose transmission  
20 systems are heavily used by third parties may receive a benefit in rates from this practice. On  
21 the other hand, utilities that are more reliant upon access to other utilities’ transmission  
22 systems in order to make power trades, and that need power from external sources, would  
23 have a higher cost of service due to the practice of transmission rate pancaking.

1 Q. Will UE's planned membership in the MISO affect its ability to continue to  
2 receive through and out transmission revenues into the future?

3 A. Yes, because the approved MISO transmission tariffs do not allow for the  
4 continued direct recovery of through and out revenues by transmission owning entities.

5 Q. How does MISO eliminate transmission rate pancaking?

6 A. MISO's transmission pricing practices require a purchaser of power to pay a  
7 transmission charge pertaining only to the transmission system in which the power "sinks;"  
8 i.e., where the transaction is terminated.

9 Q. Absent some mechanism to allow UE recovery of lost pancaking revenues,  
10 how would this pricing method for transmission affect UE?

11 A. UE would receive transmission revenues only for power transactions that sink  
12 within its system. For power transactions that go through and out UE's system, UE would  
13 not receive any revenues.

14 Q. Is this possible reduction in through and out revenues from participation in  
15 MISO a concern to UE?

16 A. Yes, as discussed in the direct testimony of David A. Whiteley and  
17 Mr. Linton. A perceived likelihood of "losing" transmission revenues as a result of  
18 membership in MISO is cited by Mr. Whiteley as a contributing factor in UE's decision in  
19 2000 to withdraw from MISO, and participate in the now-abandoned Alliance RTO effort.  
20 Likewise, one of the reasons Mr. Whiteley regards UE's involvement in the GridAmerica  
21 structure as beneficial is that structure facilitates UE's desire for a "revenue neutral" rate  
22 design for collection of its transmission revenues.

1           Q.     Is MISO supportive of UE's and the other GridAmerica transmission owners'  
2     desire for recovery of lost revenues (i.e., continued recovery of all or a part of its current  
3     level of pancaked transmission revenues)?

4           A.     Yes. The direct testimony of Mr. Godar states, "...in the FERC rate case that  
5     must be filed prior to the commencement of service by GridAmerica, Midwest ISO agrees to  
6     support the recovery of lost revenues by the Transmission Owners resulting from the  
7     elimination of rate pancaking (page 18, lines 22-23 to page 19, lines 1-2).

8           Q.     How do UE and the other GridAmerica participants generally intend to  
9     recover lost revenues from elimination of pancaking, in the upcoming GridAmerica rate  
10    proceeding before the FERC?

11          A.     In several preliminary filings by GridAmerica participants before the FERC, it  
12    has been proposed that surcharges be added to each GridAmerica participant's transmission  
13    rate, as set out in the MISO tariffs, to compensate for a level of projected lost revenues  
14    resulting from elimination of rate pancaking. Again, the GridAmerica participants are only  
15    seeking authorization for these additive charges from the FERC for a three-year transition  
16    period.

17          Q.     If the FERC accepts this transition period proposal, what would happen after  
18    this three-year period expires?

19          A.     Apparently, MISO, GridAmerica and the GridAmerica participants intend to  
20    revisit the transmission pricing policies they will have operated under during the transition  
21    period. While the new transmission pricing policies might continue to incorporate provisions  
22    for recovery of lost revenue to some degree, it is also possible that the new policies may no  
23    longer allow recovery of these revenues.



1           Q.     Has the FERC agreed to the proposal for recovery of lost revenues for the  
2     GridAmerica participants?

3           A.     While the FERC has previously stated its agreement in concept with allowing  
4     recovery of “lost revenues” associated with the elimination of rate pancaking for a transition  
5     period of some length, the FERC has not made a final decision in a rate proceeding  
6     concerning lost revenue recovery for UE and the other transmission owners whose  
7     transmission assets will be functionally controlled by GridAmerica.

8           Q.     What is the potential impact on UE if it does not achieve recovery of lost  
9     pancaking revenues as a result of participating in MISO under the GridAmerica umbrella?

10          A.     Mr. Linton’s testimony at pages 6-8 indicates that UE’s total lost revenues  
11     amount is dependent upon a number of factors that are not known at this time. However, he  
12     estimates a total lost revenue amount from elimination of pancaking of approximately \$20  
13     million. It is not entirely clear from UE’s testimony whether or not UE expects to receive  
14     dollar-for-dollar recovery of lost pancaking revenues from the FERC during the three-year  
15     transition period, or whether UE expects to receive a lesser amount of lost revenue recovery;  
16     i.e., partial rather than total lost revenue recovery.

17          Q.     Given that the FERC’s ultimate decision on granting recovery of lost revenues  
18     to UE may affect UE’s retail revenue requirement for Missouri jurisdictional customers,  
19     should the Commission be concerned that the FERC’s decision on this matter is not known at  
20     this time?

21          A.     No, for two reasons: 1) in the short term, the risk of failing to obtain the  
22     desired recovery of lost pancaking revenues should fall upon UE, not its customers; and

1 2) focusing solely on transmission revenues does not provide a complete depiction of the  
2 impact on earnings of transmission policy changes.

3 Q. Why should the risk of failing to achieve recovery of lost revenues associated  
4 with participation in MISO fall upon UE in the short term?

5 A. In July 2002, this Commission adopted a Stipulation And Agreement in Case  
6 No. EC-2002-01 that, among other items, reduced UE's permanent rate levels in Missouri in  
7 phases, and instituted a several-year rate moratorium. The terms of the moratorium specified  
8 that, prior to January 2006, the Company could not file an application to increase rates, and  
9 no party could file an earnings complaint against UE; and that UE's rates could not be  
10 changed as a result of any rate case or complaint case prior to July 2006.

11 In the event that UE fails to achieve the level of lost revenue recovery it desires from  
12 the FERC in regard to its proposed MISO participation through its contractual relationship  
13 with GridAmerica, by the terms of the Missouri rate moratorium any negative earnings  
14 impact of that circumstance would be borne solely by UE until at least July 2006. Assuming  
15 GridAmerica's operations within MISO become effective in the fall of 2003, and the FERC  
16 accepts the proposal for a three-year transition period, then the entire question of lost revenue  
17 recovery may be raised for consideration again in late 2006, when the current rate  
18 moratorium will have expired. Therefore, the FERC's upcoming rate decision on lost  
19 revenue recovery for the GridAmerica participants is not likely to have an ultimate impact on  
20 Missouri retail customers of UE in any event.

21 Q. Is potential loss of pancaked transmission revenues the only relevant item to  
22 consider in evaluating the possible earnings impacts of UE's participation in the MISO?

1           A.     No. It is important to note that there may well be a relationship between the  
2 general level of transmission rates and the number of wholesale generation transactions that  
3 take place in a given market. Transmission rates that are higher than those levels justified by  
4 the provider's cost of service may serve to prevent otherwise economical generation  
5 transactions, and create a higher cost of service for utilities in the market area and, ultimately,  
6 for their retail customers. It is impossible at this point to estimate whether there would be  
7 offsetting cost benefits in the generation area for UE and other Missouri utilities from UE's  
8 membership in GridAmerica and MISO, if transmission revenues are reduced as a result of  
9 the elimination of rate pancaking.

10          Q.     Is the Staff recommending that the Commission make any approval of this  
11 transaction contingent upon the ultimate FERC determination concerning recovery of lost  
12 revenues for the GridAmerica participants?

13          A.     No. Because of the current rate moratorium, Missouri jurisdictional  
14 ratepayers should not be affected by any short-term fluctuations in transmission revenues that  
15 may result from FERC's ratemaking decision regarding recovery of lost pancaking revenues  
16 for the GridAmerica participants.

17       **TRANSMISSION DIVESTITURE**

18          Q.     If GridAmerica's application before the FERC is approved, will UE and the  
19 other transmission owners have the ability to seek to divest transmission assets to  
20 GridAmerica in the future?

21          A.     Yes. The Master Agreement, attached as Schedule 3 to Mr. Godar's direct  
22 testimony in this proceeding, allows UE and the other transmission owners to divest their

1 transmission assets to GridAmerica at their option, in return for “units” of GridAmerica  
2 valued equal to the fair market value of the divested transmission assets.

3 Q. Does UE plan to divest its transmission assets to GridAmerica at some point  
4 in the future?

5 A. No, per Company witness David L. Whiteley’s direct testimony at page 9.  
6 Mr. Whiteley goes on to affirm that current Missouri statutes require that UE obtain  
7 Commission approval before undertaking any sale, divestiture or other disposition of its  
8 transmission assets.

9 Q. Would the Staff have concerns with divestiture of UE’s transmission assets  
10 under the terms of the agreements attached to Mr. Godar’s testimony?

11 A. Yes. Among other possible concerns, divestiture of transmission assets might  
12 lead to the Missouri Commission losing jurisdiction over the assets, with the new owner free  
13 to seek higher transmission rates from the FERC in order to recover any acquisition  
14 adjustment associated with payments above book value for the divested UE assets.

15 Q. Based on these concerns, does the Staff recommend that the Commission  
16 place a condition upon any approval of this Application concerning possible divestiture of  
17 UE’s transmission assets?

18 A. Yes. Notwithstanding Mr. Whiteley’s aforementioned testimony on this  
19 point, the Staff would recommend that the Commission include as a condition in an order  
20 approving UE’s request in this proceeding, the requirement that UE obtain explicit Missouri  
21 Commission approval before proceeding with any divestiture of its transmission assets to  
22 GridAmerica or any other entity. In that event, issues concerning potential detriment to

1 Missouri customers from a proposed divestiture can be addressed before the Commission  
2 rather than solely at the FERC.

3 **SECURITIZATION**

4 Q. What is “securitization?”

5 A. In simple terms, securitization refers to the assignment by one entity to a  
6 second entity of a contractual right to receive a future stream of revenues, in return for an  
7 upfront payment for that right from the second entity.

8 In a regulated utility context, one example of how securitization works is as follows.  
9 Utility A receives an upfront payment from non-regulated Company B, in return for the right  
10 of Company B to receive certain revenue streams from the customers of Utility A in the  
11 future. Then in the future, when Utility A receives the revenues from its regulated  
12 customers, such monies are passed on to Company B. Securitization is similar in concept to  
13 the assignment of collection of accounts receivable to a third party, for example.

14 Q. Is securitization a common practice in the utility business?

15 A. No, because third parties will generally be interested in obtaining the future  
16 right to revenue streams that are certain, or almost certain, to be realized. The amount of  
17 utility revenue streams from customers is to some extent uncertain, given the varying impact  
18 of weather conditions, economic conditions, and other factors affecting utility earnings.  
19 In those retail jurisdictions that have undergone electric restructuring, and have also  
20 approved utility recovery of “stranded costs,” some utilities have received approval to  
21 securitize their stranded cost recovery revenue streams from customers.

22 Q. Why is securitization a matter of concern respecting this Application?

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1           A.     In Schedule 4 to Mr. Godar's testimony, the Operation Agreement, the  
2 following is stated on page 28 of that document:

3                   The parties acknowledge that a portion of the revenues payable under  
4 the MISO OATT [Open Access Transmission Tariff] in respect to  
5 transmission service provided over a particular Transmission Owner's  
6 Transferred Facilities may be securitized, pledged, or otherwise  
7 subjected to superior rights of third parties ("securitized"). The  
8 Company [GridAmerica] shall cooperate with such Transmission  
9 Owner with respect to such securitization obligations.  
10 (Section 3.4.5, "Coordination with State Securitization Obligations")  
11

12           Q.     Does UE intend to enter into securitization arrangements in regard to its  
13 transmission revenue streams?

14           A.     According to UE's response to Staff Data Request No. 14, UE has not  
15 considered securitizing any transmission revenues to be received from the MISO, nor has it  
16 developed a position on when it might be appropriate to consider such a course of action. If  
17 UE were to consider securitizing transmission revenues, the response states that UE would  
18 seek approval from the Commission "if appropriate considering the circumstances under  
19 which the action were to be taken."

20           Q.     Does the Staff recommend that the Commission place a condition pertaining  
21 to securitization upon any approval of this Application by the Commission?

22           A.     Yes, the Staff recommends that the Commission condition its approval of  
23 UE's Application to join MISO by requiring UE to seek Commission approval before  
24 entering into any securitization transaction involving transmission revenues collected from  
25 Missouri retail electric customers.

26           Q.     Why should the Commission place this condition upon its approval of this  
27 Application?

1           A.     As previously discussed, the concept of securitization is premised upon a third  
2 party having a contractual right to receive certain defined revenue streams in the future.  
3 Depending upon the details of the transaction at issue, as a general matter the Staff would be  
4 concerned that securitization might involve shifting the risk of failing to collect certain  
5 revenue levels from a utility to its customers. The Commission needs to retain the right to  
6 review any securitization transactions proposed by regulated utilities involving Missouri  
7 retail customers, to ensure that the public interest of utility customers is protected from  
8 detriment.

9     **ACCOUNTING CHANGES**

10          Q.     Will UE's participation in MISO through its contractual arrangement with  
11 GridAmerica change how UE currently accounts for its transmission revenues and costs for  
12 regulatory and financial reporting purposes?

13          A.     Yes, the Staff believes that it will. Participation in these organizations, if  
14 approved, means that UE will begin receiving a portion of its transmission revenues from  
15 these entities, instead of receiving these revenues directly from customers, and UE will begin  
16 reimbursing these organizations for certain transmission related expenses, instead of  
17 incurring and paying these expenses directly. Payments to MISO for transmission service  
18 will also be based upon different tariff schedules (i.e., MISO administrative costs are  
19 intended to be covered by charges to participating entities pursuant to MISO Schedule 10).  
20 All of these factors may create the need for new accounting practices and procedures on  
21 UE's part.

22          Q.     Does UE at this time know what these new accounting requirements will be?

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1           A.     No. According to the response to Staff Data Request No. 5, UE indicates that  
2 such new procedures are the subject of ongoing discussions with MISO and GridAmerica.

3           Q.     Is the Staff recommending that the Commission adopt a condition regarding  
4 this matter as part of any approval by the Commission of UE's Application to participate in  
5 MISO through GridAmerica in this case?

6           A.     Yes. The Staff recommends that UE be ordered to meet with the Staff when  
7 the accounting requirements of MISO/GridAmerica participation are known and finalized, to  
8 discuss these changes and answer any questions concerning them.

9           Q.     Why is this condition appropriate?

10          A.     The Staff needs to be aware of any new accounting procedures that ultimately  
11 will be implemented by UE if the Commission in this case approves its Application. In  
12 particular, the Staff is interested in its ability to easily track the different cost and revenue  
13 components payable to MISO under the MISO tariff.

14          Q.     Are there any other matters you would like to address?

15          A.     Yes. On page 8 of Mr. Whiteley's direct testimony, he states that "...the  
16 GridAmerica participants will collectively pay GridAmerica an additional management fee of  
17 \$3.5 million per year for the first three years, and \$2.5 million for years four and  
18 five....AmerenUE's after-tax share of that fee is only approximately \$315,000 in years 1-3,  
19 and \$225,000 in years 4-5."

20               According to the response to Staff Data Request No. 6, UE and the other  
21 GridAmerica participants are required to pay the management fee amounts to GridAmerica  
22 on a before-tax basis, which would be approximately \$515,000 in years 1-3, and \$367,500 in  
23 years 4-5. (\$315,000 and \$225,000 divided by 61.26%, the reciprocal of the assumed



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1 composite income tax rate of 38.74%.) When and if UE seeks rate recovery of the  
2 GridAmerica management fee from Missouri retail ratepayers, the Staff presumes they will  
3 seek recovery of the actual amounts paid to GridAmerica, i.e., the before-tax management  
4 fee assessments.

5 Q. Does this conclude your rebuttal testimony?

6 A. Yes, it does.

**MARK L. OLIGSCHLAEGER**

<b><u>COMPANY</u></b>	<b><u>CASE NO.</u></b>
Kansas City Power and Light Company	ER-82-66
Kansas City Power and Light Company	HR-82-67
Southwestern Bell Telephone Company	TR-82-199
Missouri Public Service Company	ER-83-40
Kansas City Power and Light Company	ER-83-49
Southwestern Bell Telephone Company	TR-83-253
Kansas City Power and Light Company	EO-84-4
Kansas City Power and Light Company	ER-85-128 & EO-85-185
KPL Gas Service Company	GR-86-76
Kansas City Power and Light Company	HO-86-139
Southwestern Bell Telephone Company	TC-89-14
Western Resources	GR-90-40 & GR-91-149
Missouri-American Water Company	WR-91-211
UtiliCorp United Inc. / Missouri Public Service	EO-91-358 & EO-91-360
Generic: Expanded Calling Scopes	TO-92-306
Generic: Energy Policy Act of 1992	EO-93-218
Western Resources, Inc./Southern Union Company	GM-94-40
St. Louis County Water Company	WR-95-145
Union Electric Company	EM-96-149
St. Louis County Water Company	WR-96-263
Missouri Gas Energy	GR-96-285
The Empire District Electric Company	ER-97-82
UtiliCorp United, Inc./Missouri Public Service	ER-97-394
Western Resources, Inc./Kansas City Power & Light Company	EM-97-515
United Water Missouri, Inc.	WA-98-187
Missouri-American Water Company	WM-2000-222

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<b><u>COMPANY</u></b>	<b><u>CASE NO.</u></b>
UtiliCorp United Inc. / St. Joseph Light & Power Company	EM-2000-292
UtiliCorp United Inc. / The Empire District Electric Company	EM-2000-369
Green Hills Telephone Corporation	TT-2001-115
IAMO Telephone Company	TT-2001-116
Ozark Telephone Company	TT-2001-117
Peace Valley Telephone Company, Inc.	TT-2001-118
Holway Telephone Company	TT-2001-119
KLM Telephone Company	TT-2001-120
Missouri Gas Energy	GR-2001-292
The Empire District Electric Company	ER-2001-299
Oregon Farmers Mutual Telephone Company	TT-2001-328
Ozark Telephone Company	TC-2001-402
Gateway Pipeline Company, Inc.	GM-2001-585
Missouri Public Service	ER-2001-672
Union Electric, d/b/a AmerenUE	EC-2002-1
Laclede Gas Company	GA-2002-429

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<b>Company Name</b>	<b>Case Number</b>	<b>Issues</b>
Western Resources	GR-90-40 and GR-91-149	Take-Or-Pay Costs
Missouri-American Water	WR-91-211	True-up; Known and Measurable
Missouri Public Service	EO-91-358 and EO-91-360	AAO
Generic Telephone	TO-92-306	Revenue Neutrality; Accounting Classification
Generic Electric	EO-93-218	Preapproval
Western Resources & Southern Union Company	GM-94-40	Regulatory Asset Transfer
St. Louis County Water	WR-95-145	Policy
Union Electric Company	EM-96-149	Merger Savings; Transmission Policy
St. Louis County Water	WR-96-263	Future Plant
Missouri Gas Energy	GR-96-285	Riders; Savings Sharing
Empire District Electric	ER-97-82	Policy
Missouri Public Service	ER-97-394	Stranded/Transition Costs; Regulatory Asset Amortization; Performance Based Regulation
Western Resources & Kansas City Power & Light	EM-97-515	Regulatory Plan; Ratemaking Recommendations; Stranded Costs
United Water Missouri	WA-98-187	FAS 106 Deferrals
Missouri-American Water	WM-2000-222	Conditions
UtiliCorp United & St. Joseph Light & Power	EM-2000-292	Staff Overall Recommendations
Utilicorp United & Empire District Electric	EM-2000-369	Overall Recommendations
Green Hills Telephone	TT-2001-115	Policy
IAMO Telephone Company	TT-2001-116	Policy

<b>Company Name</b>	<b>Case Number</b>	<b>Issues</b>
Ozark Telephone Company	TT-2001-117	Policy
Peace Valley Telephone	TT-2001-118	Policy
Holway Telephone Company	TT-2001-119	Policy
KLM Telephone Company	TT-2002-120	Policy
Missouri Gas Energy	GR-2001-292	SLRP Deferrals; Y2K Deferrals; Deferred Taxes; SLRP and Y2K CSE/GSIP
Empire District Electric	ER-2001-299	Prudence/State Line Construction/Capital Costs
Ozark Telephone Company	TC-2001-402	Interim Rate Refund
Gateway Pipeline Company	GM-2001-585	Financial Statements
Missouri Public Service	ER-2001-672	Purchased Power Agreement; Merger Savings/Acquisition Adjustment
Union Electric Company	EC-2002-1	Merger Savings; Criticisms of Staff's Case; Injuries and Damages; Uncollectibles
Laclede Gas Company	GA-2002-429	AAO Request