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Sponsoring Party: Union Electric Company  
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Case No.: ER-2011-0028  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. ER-2011-0028**

**REBUTTAL TESTIMONY**

**OF**

**TRINA J. MUNIZ**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY  
d/b/a Ameren Missouri**

**St. Louis, Missouri  
March, 2011**

**TABLE OF CONTENTS**

I.	INTRODUCTION .....	1
II.	PURPOSE AND SUMMARY OF TESTIMONY .....	2
III.	CUSTOMER COMMUNICATIONS EFFORTS .....	2
IV.	STAFF’S APPROACH TO REVIEWING EXPENDITURES.....	5
IV.	SPECIFIC ADVERTISING CAMPAIGNS.....	7
A.	POWER ON CAMPAIGN .....	7
B.	TOP RATES CAMPAIGN.....	8
C.	NUMBERS CAMPAIGN.....	9
D.	RELIABILITY CAMPAIGN .....	10
E.	SAFETY – LOUIE THE LIGHTNING BUG .....	11
F.	OTHER ADVERTISING EXPENSES.....	11

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **TRINA J. MUNIZ**

4  
5 **CASE NO. ER-2011-0028**

6 **I. INTRODUCTION**

7 **Q. Please state your name and business address.**

8 A. Trina J. Muñoz, Union Electric Company d/b/a Ameren Missouri (“Ameren  
9 Missouri” or “the Company”), located at One Ameren Plaza, 1901 Chouteau Avenue,  
10 St. Louis, Missouri 63103.

11 **Q. What is your position with Ameren Missouri?**

12 A. I am the Managing Supervisor of Ameren Missouri Communications. I am  
13 responsible for the marketing and advertising for Ameren Missouri’s electric and gas  
14 operations.

15 **Q. Please describe your educational background and employment  
16 experience.**

17 A. I joined Ameren Corporation in 2001 as the Senior Supervisor of Advertising.  
18 I have 24 years of marketing and advertising experience. In 2009, I became the Managing  
19 Supervisor of Communications for Ameren Missouri.

20 Prior to joining Ameren, I spent 15 years at Bank of America in their Marketing,  
21 Advertising and Public Relations Department. When I left in 2001, I was the Vice President,  
22 Marketing Relationship Manager for Midwest South Consumer Marketing. I have a  
23 Bachelor of Science degree in Business Administration with an emphasis in Marketing from

1 Southern Illinois University at Edwardsville and a Masters of Business Administration from  
2 Webster University.

3 **II. PURPOSE AND SUMMARY OF TESTIMONY**

4 **Q. What is the purpose of your testimony in this proceeding?**

5 A. The purpose of my testimony is to discuss the importance of communicating  
6 to Ameren Missouri's customers through marketing and advertising, and explain how such  
7 communication positively impacts our customers. I will also discuss the costs associated  
8 with these efforts and respond to the portion of the Staff Report Revenue Requirement Cost  
9 of Service ("Staff Report") sponsored by Lisa Ferguson addressing the Company's  
10 advertising expenses.

11 **III. CUSTOMER COMMUNICATIONS EFFORTS**

12 **Q. Why is it important for Ameren Missouri to use advertising to reach its**  
13 **customers?**

14 A. While I realize the Staff refers to these expenditures as advertising, they are  
15 really part of our effort to improve communications with our customers. We have repeatedly  
16 heard from our customers that they would like increased communications from us. This need  
17 has been expressed on a day-to-day basis through normal operations as well as in the  
18 customer surveys that we conduct. Ameren Missouri is committed to recognizing and  
19 responding to the concerns of our customers and we have made a concerted effort to provide  
20 more information with our advertising efforts. With over 1.2 million customers, advertising  
21 is the most efficient and effective way to communicate to our customers.

1           **Q.     Some individuals testified at the local public hearings that they don't**  
2 **know why Ameren Missouri advertises and do not think that Ameren Missouri needs to**  
3 **spend money on advertising. If you are going to advertise, aren't there less expensive**  
4 **ways to get your message out?**

5           A.     It is my opinion that one cannot determine what advertisements are “less  
6 expensive” without knowing how many people the message will reach, which is a factor  
7 Ms. Ferguson doesn't consider. If the Commission measured expense solely in terms of  
8 dollars per advertisement, there are less expensive ways to advertise. However, those  
9 methods are not as effective in getting information to customers. The less expensive ways  
10 reach fewer customers per dollar spent. When choosing communication channels, the  
11 Company takes many factors into consideration. One of the main considerations for an  
12 advertisement is the ability to make an impact with customers and to drive the recall of the  
13 message.

14           For instance, there were customers who testified at the public hearing that claimed to  
15 have never been notified of the public hearing schedule. Yet every customer received a bill  
16 insert with their January bills. Bill inserts are a low cost method of communication with our  
17 customers, but also have a lower impact and, as a result, are less cost effective. A bill insert  
18 relies on the customer to take time out of their busy lives and read the messages that are  
19 being sent to them. Television, radio and outdoor advertising interact with customers in their  
20 everyday lives without additional effort on their part.

21           Our customers are exposed to over 20,000 messages a day. They receive these  
22 messages in many different ways, both consciously and subconsciously. In order to  
23 effectively communicate with our customers we must find the right channels for the

1 messages to reach them. This requires an integrated approach that includes all forms of  
2 communications including both paid and unpaid communications. Research has shown that  
3 for a message to make an impact on an individual it must be seen three to five times. Many  
4 messages are seen but not retained. Ameren Missouri must find the right mix of  
5 communications to reach our customers. We seek to do this by delivering a consistent  
6 message through various channels of communications.

7 It is also important to have a clear “call to action” as part of each communication.  
8 The call to action lets the customers know what they need to do – go to a website, call a  
9 phone number, turn down a thermostat, etc. This is why Ameren Missouri’s advertisements  
10 include a website, which will provide the customer additional, detailed information on the  
11 topic of that advertisement.

12 Ameren Missouri surveys its customers on a regular basis to determine the messages  
13 that are important to them. A survey done at the beginning of 2010 by the third party vendor  
14 CCI showed that on average, at that time, 75% of our customers believed we were  
15 communicating the right amount. Those who felt that they were not receiving enough  
16 information asked to receive information on energy-savings tips, information on programs,  
17 services offered and account/billing information. The survey went on to find that those  
18 customers who are aware of Ameren Missouri’s advertising are 51% more satisfied than  
19 those who have not seen messages.

20 Furthermore, the JD Power Residential Electric 2010 Study results for Ameren  
21 Missouri show positive progress on communications in all areas. This study confirmed that  
22 the messages that we place reach our customers and increase their overall satisfaction. This

1 indicates to the Company that we are reaching a communication level which should be  
2 sustained.

3 **IV. STAFF’S APPROACH TO REVIEWING EXPENDITURES**

4 **Q. Do you agree with the cost disallowances proposed by Ms. Ferguson?**

5 A. I do not. In fact, I have a basic disagreement with the approach that the Staff  
6 has taken. Ms. Ferguson testified she followed the 1985 KCP&L ruling on advertising  
7 classifications<sup>1</sup> and the Report and Order from the Commission in Ameren Missouri’s earlier  
8 rate case, Case No. ER-2008-0318. But Ms. Ferguson is an auditor and, while I don’t  
9 question her skills or qualifications as an auditor, she lacks the training, experience or  
10 expertise to evaluate communications messages.

11 **Q. Do you have any other concerns with Staff’s approach?**

12 A. I do. In a previous Ameren Missouri rate case order, the Commission found  
13 fault with “Staff’s attempt to individually categorize each and every advertisement produced  
14 by AmerenUE,” finding, instead, that “it makes more sense to look at an advertising  
15 campaign as a whole.”<sup>2</sup> The Commission continued, “Staff would do well to examine  
16 advertisements on a campaign basis rather than becoming ensnared in the effort to evaluate  
17 individual ads within a larger campaign. If on balance a campaign is acceptable then the cost  
18 of the individual advertisements within that campaign should be recoverable in rates.”<sup>3</sup>

19 Despite this very clear direction from the Commission, Ms. Ferguson evaluated each  
20 individual advertisement independent of its campaign and then made a determination as to  
21 whether she would recommend disallowance based on what she deemed the messages of that  
22 individual ad to be.

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<sup>1</sup> *Re: Kansas City Power & Light Co.*, 28 Mo. P.S.C. (N.S.) 228, 269 (1986).

<sup>2</sup> Case No. ER-2008-0318, Report and Order, p. 118.

<sup>3</sup> Id.

1           **Q.     Can you explain what you mean?**

2           A.     Yes. Ms. Ferguson first reviewed all advertising on an ad-by-ad basis. She  
3 then grouped the expenses into Campaigns to compare that result to her previous review. I  
4 do not consider this to fulfill the Commission’s early order. By her analysis, a campaign is  
5 acceptable if more than 50% of the individual ads are acceptable. It is her insistence upon  
6 reviewing each individual advertisement that creates the problem in the first place. Any one  
7 message may not convey all of the necessary information, but the campaign as a whole will  
8 convey that information. That is the way advertising campaigns work. Ms. Ferguson’s  
9 approach misses that point completely. The Company believes that focusing on advertising  
10 campaigns instead of on individual advertisements is the best method to use and the  
11 Commission has agreed with that approach. Ms. Ferguson’s ad-by-ad approach should be  
12 rejected by the Commission in this case for the same reasons it was rejected in Case No.  
13 ER-2008-0318.

14           **Q.     Did Ms. Ferguson explain how she classified each advertisement for**  
15 **which she recommended disallowance?**

16           A.     Her portion of the Staff Report did not include any explanation. However,  
17 during her deposition, it became clear that her classifications were completely arbitrary. For  
18 example, she testified that she “determined the primary message by reading the ad”<sup>4</sup> but  
19 admitted that the standard she used to make this determination was her “work experience.”<sup>5</sup>  
20 And when she was asked if she applied an objective standard to make her determination, her  
21 response was that she did not know how to answer that question.<sup>6</sup>

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<sup>4</sup> Ferguson Deposition, p. 47, l. 13-17.

<sup>5</sup> Id., l. 11-17.

<sup>6</sup> Id., l. 6-10.



1 The Commission order from the previous rate case stated:

2 Erin Carle examined each of AmerenUE's Power On advertisements and  
3 offered an opinion on whether each advertisement conveyed enough useful  
4 information to the public. The problem with that approach is Erin Carle is an  
5 accountant, and is working on her MBA. Although she claims to be an  
6 advertising expert for ratemaking purposes, she has no training in the field of  
7 advertising, aside from looking at old cases at the Commission. Not  
8 surprisingly, given her lack of expertise and that vague standard by which she  
9 was attempting to judge the individuals advertisements, Carle's testimony fell  
10 apart on cross-examination and it became clear that her categorization of  
11 particular Power On advertisements as either General and thus recoverable, or  
12 Institutional, and thus excludable, was essentially arbitrary.<sup>7</sup>

13  
14 The Commission could issue an order in this case using the exact language as is quoted  
15 above. Ms. Ferguson is an auditor<sup>8</sup> who has only had one class in advertising<sup>9</sup>, who does not  
16 have training other than looking at old Commission cases<sup>10</sup> and who categorized particular  
17 advertisements using a vague standard that was "essentially arbitrary."

18 **IV. SPECIFIC ADVERTISING CAMPAIGNS**

19 **Q. Were there specific campaigns that Ms. Ferguson recommended**  
20 **disallowing that you believe the cost is justified for recovery?**

21 A. Yes, there are several. I will go through them by campaign.

22 **A. *POWER ON CAMPAIGN***

23 The first one includes the two flights of Power On advertising. The Commission  
24 allowed recovery of the Company's Power On advertising in Case No. ER-2010-0036.<sup>11</sup> In  
25 this case, Ms. Ferguson has recommended allowing only the Power On radio and newspaper  
26 advertising cost. She recommended disallowance of the television and outdoor costs for this

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<sup>7</sup> Case No. ER-2008-0318, Report and Order, February 6, 2009, p. 118.

<sup>8</sup> Ferguson Deposition, p. 8, l. 7-8.

<sup>9</sup> Ferguson Deposition, p. 36, l. 12-22.

<sup>10</sup> *Id.*, p. 39, l. 2-19.

<sup>11</sup> In the Company's last rate case, Case No. ER-2010-0036, advertising expenditures were part of a black box settlement of a portion of the revenue requirement.

1 campaign, even though the messages were the same. The cost for the campaign was  
2 \$46,966. Ms. Ferguson did capture credits that were given back to the Company by its  
3 advertising agency, but it was for credits related to advertisements she then recommended be  
4 disallowed. By allowing credits but not the expense, it resulted in a negative \$1,392  
5 adjustment.

6 Finally, there is no reason to recommend allowance of a cost of the message when it  
7 is delivered through one medium (print) and recommend disallowance when the same  
8 message is carried in another medium (television and outdoor). Of course each provides a  
9 different amount of information. As the Commission has stated, “a simple billboard  
10 advertisement that by its nature cannot convey a great deal of information to a motorist  
11 rushing by at 70 miles per hour, may motivate and direct that customer to seek out more  
12 detailed information from another source.”<sup>12</sup>

13 The Power On campaign, when properly reviewed as a campaign, provides  
14 information about the Company’s Power On work, the cost of which the Commission has  
15 previously found to be recoverable.<sup>13</sup> I believe the entirety of this campaign should be  
16 allowed by the Commission. Examples of the advertisements in question cannot be  
17 submitted in EFIS due to the EFIS limitations so they are not attached. They will be supplied  
18 on CD and are marked as Schedules TJM-ER1a and TJM-ER1b.

19 ***B. TOP RATES CAMPAIGN***

20 The Top Rates ads were created to help our customers understand the cost of the  
21 electricity for our customers as compared to other areas of the country and to communicate  
22 what the Company is doing to keep that cost low. The total cost of this campaign was

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<sup>12</sup> Case No. ER-2008-0318, Report and Order, p. 118.

<sup>13</sup> Id., p. 119.

1 \$124,949. Ms. Ferguson recommended allowance of only a small portion, \$134, which was  
2 for posters. Clearly, she considered the overall topic of the posters acceptable. The posters  
3 contained the same information that was conveyed through the television and newspaper  
4 advertising. For apparently no reason other than they were television and newspaper  
5 advertisements, Ms. Ferguson recommended disallowance of a portion of the campaign. I  
6 believe the entirety of this campaign cost should be allowed by the Commission. An  
7 example of the audio advertisement in question cannot be submitted in EFIS due to the EFIS  
8 limitations so it is not attached. It will be supplied on CD and is marked as Schedule  
9 TJM-ER2a. TJM-ER2b is attached.

10 **C. NUMBERS CAMPAIGN**

11 The Numbers campaign, which was used during radio broadcasts, was only partially  
12 allowed by Staff. Ms. Ferguson recommended allowance for six of the radio spots and  
13 disallowance of four of the radio spots. The total cost of the campaign was \$188,726.  
14 Ms. Ferguson recommended allowance of \$113,470. Again, clearly she thought the message  
15 of the campaign was acceptable. And, again, all of the spots have a similar message; they  
16 talk about the importance of keeping some “numbers” low, such as reliability numbers. This  
17 communicates an important aspect of the work the Company has done and continues to do in  
18 order to make our infrastructure more reliable. If she had followed the previous Commission  
19 order, the total amount of the campaign, \$126,529, would be allowed. These advertisements  
20 cannot be submitted in EFIS due to the EFIS limitations so they are not attached. They will  
21 be submitted on CD and are marked as Schedules TJM-ER3a through TJM-ER3j.

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**D. RELIABILITY CAMPAIGN**

Since the large and damaging storms of 2006 and early 2007, reliability has been a main concern of our customers. They have asked repeatedly what we are doing to keep the power on and we must use advertising to communicate answers back to our customers. Incredibly, Ms. Ferguson recommended the Commission disallow the Reliability Campaigns, almost in total.

This campaign conveys an important message to our customers, helping them understand what we are doing to make their electricity service more reliable. In fact, the Commission has taken the same approach with their new magazine, PSConnections, which has been produced by the Commission and paid for by their Missouri constituents. One of the articles in the first publication talks about efforts “to increase service reliability for customers of Missouri’s investor-owned electric utilities.”<sup>14</sup>

The Company reports its reliability statistics to the Commission on an annual basis. Providing this information to its customers, albeit in a much simplified manner, is important and should be something the Commission encourages the utilities it regulates to do. Staff’s recommendation discourages the sharing of this important information by making the costs unrecoverable. Ms. Ferguson’s recommendation should be rejected.

The total cost of this campaign was \$2,313,092. The total recommended to be allowed by Ms. Ferguson was only \$120,289. The print advertisements in question are attached as Schedules TJM-ER4f through TJM-ER4i. The video and audio advertisements cannot be submitted in EFIS due to the EFIS limitations so they are not attached. They will

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<sup>14</sup> PSConnections, Winter 2010-11, p. 8.

1 be supplied on CD and are marked as Schedules TJM-ER4a through TJM-ER4e and  
2 TJM-ERk.

3 ***E. SAFETY – LOUIE THE LIGHTNING BUG***

4 For years, the costs to communicate safety messages have been recoverable. In fact,  
5 the KCPL case upon which Staff relies says that safety advertising is generally recoverable.  
6 This year, the \$22,862 expense for Louie the Lightning Bug’s Parade balloon was  
7 recommended to be disallowed. When the balloon appears in parades, there are  
8 announcements that remind the audience that Louie is the Ambassador for Safety for Ameren  
9 Missouri. He wants everyone to know “When Lines are Down, Don’t Hang Around.” The  
10 Louie Bus accompanies the balloon in all parades and this “slogan” appears on the bus as  
11 well. Children are especially likely to pay attention to the balloon. This safety-related  
12 advertising cost should not be disallowed by the Commission. Photos of Louie are included  
13 on the CD as Schedules TJM-ER5a and TJM-ER5b.

14 In her deposition, Ms. Ferguson admitted that Louie was recognized as an icon for  
15 safety. “It does speak to safety. I mean everybody realizes that Louie the Lightening Bug is  
16 part of safety.”<sup>15</sup> Yet, her recommendation to disallow this cost contradicts these statements.  
17 In fact, when queried as to why this message should not be allowed by the Commission,  
18 Ms. Ferguson creatively argued that a balloon “could possibly be caught on street poles or  
19 power lines...”<sup>16</sup> Louie clearly conveys a safety message to the public and this cost should  
20 be allowed by the Commission.

21 ***F. OTHER ADVERTISING EXPENSES***

22 **Q. Are there other costs that were disallowed with which you disagree?**

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<sup>15</sup> Ferguson Deposition, p. 49, l. 24-25.

<sup>16</sup> Id., p. 50, l. 1-3.

1           A.       Yes, there are several, which I will discuss individually. Our customers have  
2 expressed an interest in renewable energy and how we are complying with the renewable  
3 energy requirements of state law. They want Ameren Missouri to invest in diverse ways of  
4 generating electricity. Additionally, the Company is required by law to obtain a certain  
5 percentage of its power from renewable energy sources. One of our newest power plants will  
6 be the result of the partnership between Ameren Missouri and Fred Weber, Inc. We call this  
7 project “Methane to Megawatts.” To help our customers understand this relationship and the  
8 process that we will employ to take gas from landfills and turn it into electricity, we created a  
9 video that is housed on our website, AmerenMissouri.com. The cost of producing this video  
10 was \$4,600. Ms. Ferguson recommended disallowance of this expense. She stated that she  
11 felt the message was created for the partnership of Ameren Missouri and Fred Weber, not to  
12 communicate about a new type of renewable generation. There is no basis for Ms.  
13 Ferguson’s interpretation and her reasoning is nothing more than her personal opinion. The  
14 Company believes providing our customers with this video give them valuable information,  
15 that the cost is reasonable and that it should be allowed by the Commission. The video  
16 cannot be attached due to EFIS limitations. It will be supplied on CD and is marked as  
17 Exhibit TJM-ER6.

18           The sponsorship that we have with the St. Louis Rams provides many opportunities to  
19 get our message out to their fans, many of which are also our customers. The Company  
20 agrees that the entire cost of the sponsorship should not be included in its revenue  
21 requirement. However, the portions that can be classified as general advertising should be  
22 recovered. These are messages that talk about the benefits of electronic billing, energy  
23 efficiency or other programs that help our customers. Ms. Ferguson recommended a

1 disallowance of \$80,075. A very similar issue was addressed in a previous Ameren Missouri  
2 rate case. In that case, the Commission found the cost of St. Louis Rams advertisements to  
3 be recoverable. “The same finding must be made in relation to the challenged Dollar More  
4 advertisement, which was a print advertisement that appeared in the game day program for  
5 the St. Louis Rams and urged Rams fans to go to the company website to learn more about  
6 the Dollar More program. The overall campaign to promote the Dollar More program is  
7 acceptable, so the individual advertisements within that larger campaign shall not be  
8 disallowed.”<sup>17</sup> Print copies of the advertisements in dispute in this case are attached as  
9 Schedules TJM-ER7a and TJM-ER7b. The video in question cannot be submitted in EFIS  
10 due to the EFIS limitations so it is not attached. It will be supplied on CD and is marked as  
11 TJM-ER7c.

12 Ms. Ferguson also recommended disallowance of a Giant U that is used at trade  
13 shows to raise awareness of UEfficiency.com and Ameren Missouri’s energy efficiency  
14 efforts. It is an 8 foot tall U that has the website prominently displayed on it. During trade  
15 shows there is a need to find unique and unexpected ways to stand out among the other  
16 exhibitors. Once the Company has gained the participants’ attention, we can share many  
17 energy efficiency messages with them on a one-on-one basis. Ms. Ferguson agrees that this  
18 is an attention getter but does not think that it is being used for energy efficiency. “To me  
19 this would be something that would—that the company would want to pop out at somebody  
20 so that they would come over...”<sup>18</sup> After agreeing it would cause participants to visit  
21 Ameren Missouri’s exhibit she stated it was not recoverable because, “...so it’s basically  
22 promoting, I think, the image of the company. This is—they’re wanting you to come over so

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<sup>17</sup> *Id.*, p. 118.

<sup>18</sup> Ferguson Deposition, p. 56, l. 3-5.

1 that you recognize who they [the Company] are and what they're doing."<sup>19</sup> The cost of this  
2 item is \$2,875. A picture of this item is included on the CD as Schedule TJM-ER8. The  
3 Company does not believe Ms. Ferguson's reasoning constitutes a justifiable reason to  
4 disallow this cost and believes this should be an allowable cost

5 Every year, Ameren Missouri sponsors an Adopt A Shoreline Clean Up project at the  
6 Lake of the Ozarks. We encourage property owners around the Lake to clean up the shore  
7 and water from the debris on the docks. These efforts help keep our spillways free of debris.  
8 This is important to ensure the spillways operate efficiently. The cost for advertising this  
9 event was \$2,437. Ms. Ferguson recommended disallowance of this cost because it was only  
10 trash pickup with no benefit to the customer. Clearly, this is incorrect and the cost of this  
11 advertisement should be allowed. A copy of these advertisements is attached as Schedule  
12 TJM-ER9.

13 Pure Power is Ameren Missouri's renewable energy credits ("REC") program. This  
14 program has been debated several times in previous rate cases and the Commission has  
15 approved the program and the tariff for this program each time. It is a voluntary program  
16 offered to our customers who are looking for ways to further the development of renewable  
17 energy. If we did not advertise, our customers would not know that we offer this program, so  
18 there is a need to raise awareness of the program and where and how our customers can  
19 enroll or find out information. One of the communication events for Pure Power was a  
20 partnership with the St. Louis Blues. The cost of the event was split and Ameren Missouri  
21 paid only a third of the total cost. This cost, \$22,939, was recommended to be disallowed by

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<sup>19</sup> Id. 1. 5-8.



1 Ms. Ferguson. This event provided information on our Pure Power program and should be  
2 allowed by the Commission.

3 The cost associated with the printing of marketing materials for our Gatekeepers  
4 Program was proposed to be disallowed by Ms. Ferguson. The cost of this material was  
5 \$1,630. I realize this is a very small cost compared to the requested revenue requirement;  
6 however, Staff's recommendation astonished the Company. The Gatekeepers Program was  
7 developed to promote the safety of our customers. Our field personnel are trained to look for  
8 signs that may indicate a customer is in distress. The Company also raises awareness of our  
9 customers through this program by encouraging them to keep an eye on their elderly  
10 neighbors for any signs of a medical crises or the need for assistance. This is something that  
11 the Commission should encourage Missouri utilities to do, rather than discourage the  
12 program by not allowing the cost. A copy of these brochures is attached as Schedules TJM-  
13 ER10a and TJM-ER10b.

14 Ms. Ferguson prorated the costs associated with the retainer for service from the  
15 Company's advertising agency. She took the percentage of advertisements which she  
16 deemed recoverable and presumed the same level for the retainer. This is a fundamental  
17 misunderstanding of how the retainer works. It cannot be split by advertising campaign or by  
18 advertisement. Regardless of what is produced by the agency, these fees are contractual and  
19 must be paid. The total cost of the retainer was \$682,500 during the test year and it paid for  
20 the labor at the agency which is needed to manage our relationship including account  
21 supervision, creative services, administrative services, consumer research, etc. The entire  
22 cost should be allowed. If the Company were to contract for only the campaigns that

1 Ms. Ferguson believes should be allowable, the cost for services would be charged at a much  
2 higher rate.

3 The Company produced a video of the progress that was being made at Taum Sauk  
4 and made it available to customers on the Company's website. The cost of this video was  
5 \$4,600 and it helps answer many of the questions our customers ask about the plant and  
6 about Johnson's Shut-Ins State Park. Ms. Ferguson recommended disallowance of the entire  
7 cost. I feel it should be allowed by the Commission as it provides helpful information to our  
8 customers. The video in question cannot be submitted in EFIS due to the EFIS limitations so  
9 it is not attached. It will be supplied on CD and is marked as Schedule TJM-ER11.

10 Energy Efficiency continues to be a priority to the Company and its customers. From  
11 time to time, we use material that has been created for other uses to share a message with  
12 customers. That was the case for the Type Animated Energy Efficiency message. The cost  
13 of this video was \$2,405. After watching the advertisement video during her deposition,  
14 Ms. Ferguson recognized this message as energy efficiency. She then went on to state that  
15 she didn't believe she had recommended disallowance. Later she said that she had  
16 misspoken.<sup>20</sup> Perhaps she did. Or perhaps her initial impression after viewing it was correct  
17 and this cost should be recoverable. It was not until she consulted her notes that she changed  
18 her mind and said, "the primary message to me is not...the provision of adequate service.  
19 Yes, it is pointing to the customers that the less they use the less their bill will be. But I don't  
20 think that necessarily has to do with a general categorization."<sup>21</sup> Staff has failed to provide a  
21 valid reason for excluding this cost and it should be allowed by the Commission. The video

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<sup>20</sup> Id. p. 85, l. 2.

<sup>21</sup> Id. p. 84, l. 19-23.

1 in question cannot be submitted in EFIS due to the EFIS limitations so it is not attached. It  
2 will be supplied on CD and is marked as Schedule TJM-ER12.

3 **Q. Were there any advertising adjustments that the Staff has made since its**  
4 **first review?**

5 **A.** Yes. After additional review Staff changed its recommendation on a couple  
6 of items. Specifically, their adjustment for the Dollar More Program, Be Cool Program and  
7 Meet the Heat Program. Staff also now recommends the Commission allow the Quantum  
8 Weather Ads, the Missouri Valley Conference Print Ad, graphic design software, press  
9 release expense and table skirt costs. The total additional was amount is \$100,853.

10 **Q. In total, how much in additional advertising expenditures are you asking**  
11 **the Commission to approve?**

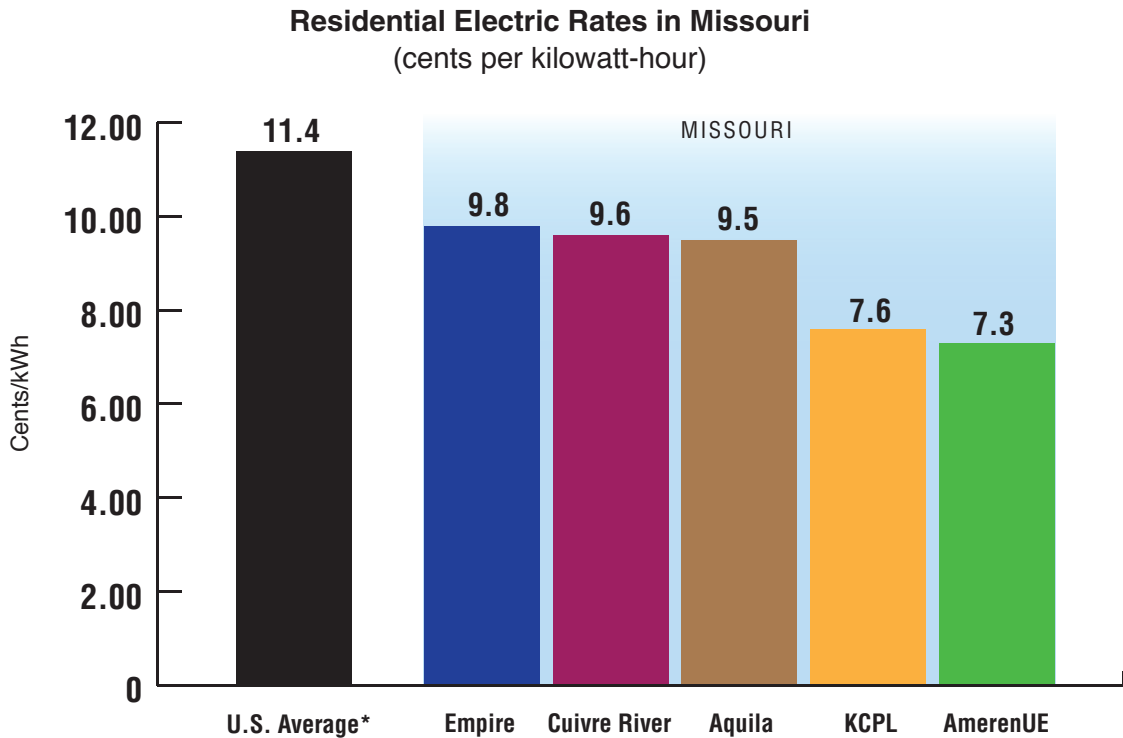
12 **A.** In total, Ameren Missouri is asking the Commission to allow an additional  
13 \$3,264,120. This means the Company is seeking recovery of \$4,690,699 instead of  
14 Ms. Ferguson's proposed allowance of \$1,426,579.

15 **Q. Does this conclude your rebuttal testimony?**

16 **A.** Yes, it does.



TOP-RATED SERVICE + LOW COST = VALUE



As of March 1<sup>st</sup> AmerenUE electric rates increased approximately 8% to an average residential rate of 7.3 cents per kilowatt hour, as shown above. It isn't an action we take lightly, but even with that increase we want to assure you that UE customers get great value.

We take pride in the fact that despite soaring costs in many sectors of the economy we've been able to keep your electric rates among the lowest in the country!

In addition, as the chart shows, UE residential customers pay far lower rates than many of our Missouri neighbors. Yes! Our rates are lower than the overwhelming majority of co-ops or municipal power companies or even Kansas City Power and Light.

At the same time, through our billion dollar PowerOn program we've made extensive upgrades to our system, resulting in enhanced service and reliability for *all* UE customers.

It's all part of our pledge to you, our customers, to connect Missouri by providing reliable power, dedicated customer service and vision for a sustainable future.

For more information on how reducing your individual electric usage can reduce your electric bills visit our Web site at [ameren.com/energyefficiency](http://ameren.com/energyefficiency).

**We Listen. We Respond. We Deliver.**



\*Source: Projected 2009 National Average DOE/EIA. Average residential rates using 1000 kWh, per month. **Schedule TJM-ER2b**



Our apologies to the neighbors.

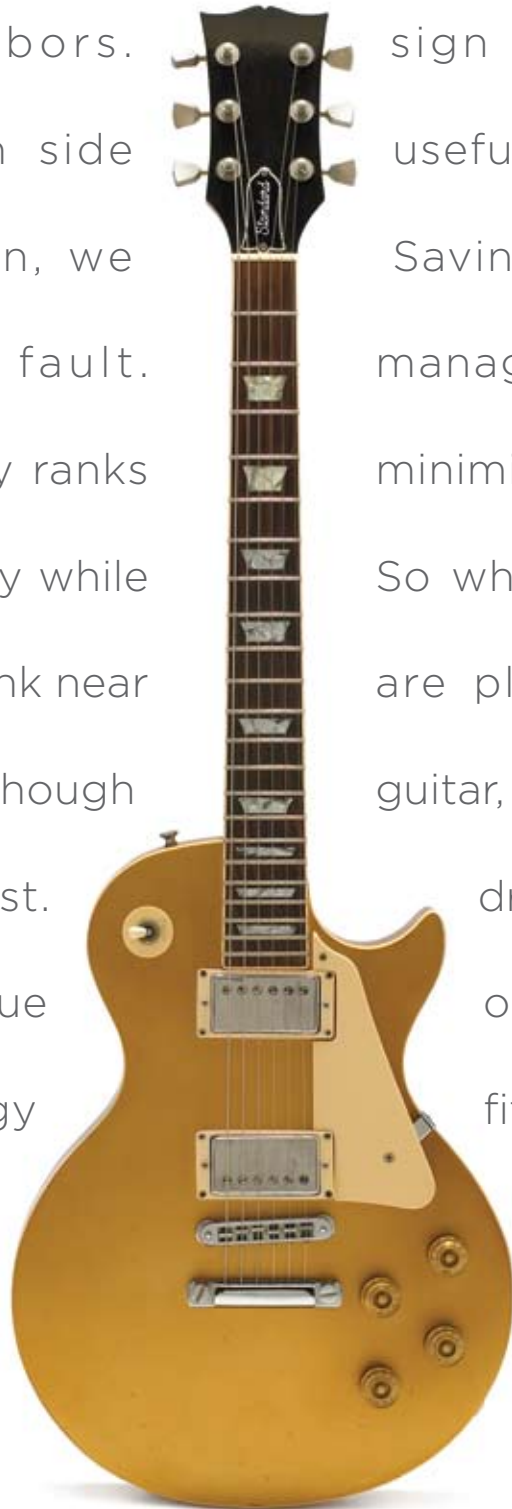
Depending on which side of the amp you're on, we can be reliable to a fault. AmerenUE consistently ranks near the top in reliability while our rates continue to rank near



the bottom. Though

we never rest.

That's why we continue to sponsor many energy assistance programs like Dollar More and Budget Billing.



On our Web site you can sign up for eBill and find useful tools like the Energy Savings Toolkit to help you manage your account and minimize usage.



So whether you are plugging in an electric guitar, vacuum cleaner or hair dryer, you can rock, clean or fluff however you see fit. To learn more, plug in to [ameren.com](http://ameren.com).



We Listen. We Respond. We Deliver.

# Your tunes.

Schedule TJM-ER4f

# Your popcorn.

Where does the power to turn a kernel of corn inside out come from?



Could be from a hydroelectric dam

on the Osage River. Or even technology that turns methane from landfills into



electricity.

More and more, the truth might surprise you. At AmerenUE, we're investing millions in a variety of cleaner, ever-renewable energy

sources. Harnessing over 100 megawatts of windpower may



seem like an awful lot of trouble for family movie night.

But like you, we're



thinking long term. Just something to think about the next time you're

anxiously waiting for the microwave to ding. Dig into more



at [amerenue.com](http://amerenue.com).



We Listen. We Respond. We Deliver.



Somewhere, there's an unruly shrub long overdue for a trim. Or a boxwood awaiting a flat-top. And while we're always there to make sure the clippers buzz to life, it's just part of what we do.



Did you know AmerenUE is halfway to putting up 100 monitoring stations to predict storms hours in advance? We call it Quantum Weather. And as part

of our Power On Program, we're also stepping up line inspections and aggressively trimming trees. All that to prevent outages or at least get a jump on restoring your service. So you can get back to giving that Japanese Yew the poodle cut it deserves. Once that's done, check out [ameren.com](http://ameren.com).



We Listen. We Respond. We Deliver.

# Your hedges.

Schedule TJM-ER4h







**A power grid energized  
by the human grid.**



[amerenue.com/reliability](http://amerenue.com/reliability)

Schedule TJM-ER4i

[ameren.com/poweron](http://ameren.com/poweron)

**FALL MEANS FOOTBALL.** It's also an opportunity to make improvements before the winter storms. To do it, we're aggressively inspecting the entire grid to find potential faults in advance, and ensure the system is as strong as it possibly can be. All to make certain the power is there when you need it.

**POWER  
ON**  
ENLIGHTENING IN COMMUNITIES



**STRENGTHEN THE LINE,  
STRENGTHEN THE DEFENSE.**

Schedule TJM-ER7a

## Win the trip. Dress the part.

You can't win a Road Trip with the Rams if you don't sign up for eBill. Go to [ameren.com/ebill](http://ameren.com/ebill) and go paperless today. Then, get packing for Chicago on December 6th when the Rams take on the Bears.



We Listen. We Respond. We Deliver.



**Thank you for helping to keep the lake clean for all of us.  
Ameren salutes these Adopt-the-Shoreline organizations and individuals.**

**Organizations**

Ameren UE Real Estate  
 Ameren UE/ Osage Plant  
 American Sun Control  
 Arlan Carlson  
 Chris Purchase  
 Dock Works, Inc.  
 Hart Diving  
 Lake Ozark Betterment Committee  
 Lake Ozark Rotary- Day Break Club  
 Lake Ozark Rotary- Noon Club  
 Stanley Steamer Carpet Cleaner  
 Anchorage Park Resort  
 B & B Dock Repair and Removal  
 Gravois Fire Protection District  
 Johnie & Julia Ray  
 Jolly Roger Grub-N-Grog  
 Rocky Mount Lions Club  
 Timber Ridge Home Association, Inc.  
 Central Bank of Lake of the Ozarks  
 Copper Siteworks  
 Lake of the Ozarks Watershed Alliance  
 Lake Ozarks Yachting Association  
 Legacy Builders  
 Midwest Coast Association  
 Shawnee Bend #3 Homeowners  
 Bagnell Dam Association of Realtors  
 Krantz and Associates  
 City of Osage Beach  
 Ozark Mortgage  
 Allied Waste

Lake of the Ozarks State Park  
 Osage High School Ecology Club  
 Ozark Coast Kiwanis Club  
 Pickled Petes  
 Camdenton Optimist Club  
 Creel Resort  
 Larry & Suzette Snodderley  
 Shoremaster/Galva-Foam Marine Industries  
 Stokes Dock Company  
 Tan-Tar-A Resort/Tan-Tar-A Estates  
 Bear Bottom Resort  
 K. & T. Guttering & Siding  
 Pirates Point  
 Rough Water Docks  
 Ameren Substation Maintenance & Relay Testing  
 Campbell Construction/Huff's Family Fireworks  
 Lee Roy Brown  
 Osage Comm. Elks Lodge #2705  
 The 50-55'ers Elite Fleet  
 Clean Mean 40's Machines  
 Fawn Valley Forty Sixers  
 Big Island Home Owners  
 EE Resort Association  
 Fowlers Point Homeowners  
 Ha Ha Tonka State Park  
 Lake of the Ozarks Marina  
 Lamplighter Resort  
 Missouri Dept. of Conservation  
 Old Kinderhook  
 Prairie Hollow Cove  
 Val-E-Vue Resort

Lakeview Resort  
 Sunrise Ridge Condo Association  
 Windermere Baptist Conference Center  
 Larry & Norma Oder  
 Paradigm Construction/Pinnacle Point  
 Rebel Harbor Marina  
 Grandview Beach Property Owner's Assoc.  
 Horizons Laker Education Center  
 HaHa Tonka Resort Association  
 Midwest Flotation and Spa

**Supporting members**

Camdenton Chamber of Commerce  
 Coffman Marina, Inc.  
 D&B Docks, Inc,  
 Dave Mungenast Yacht Club Marina  
 Der Vater's Edge RV Park & Marina  
 Dock Pushers  
 Glencove Yacht Club and Marina  
 Horseshoe Bend Dock & Rip Rap Service  
 Mallard Point  
 Rich's Dock Co  
 S.O.S Barge & Dock  
 Trico Dock Center  
 Atlantis Diving

**We Listen. We Respond. We Deliver.**





**Call 1-800-392-0210 if you observe abuse or neglect of an older customer.**

Call 2-1-1 for general questions and other community resources.



Schedule TJM-ER10a

# Gatekeeper links older people in need with community services.

## Watch your older customers for problems with:

- Communication
- Economic Condition
- Social Condition
- Emotional Health
- Personal Appearance
- Physical Limitations
- Condition of Home



## Concerned About An Older Person?

### How Does It Work?

The back of this card lists some of the warning signs that may indicate that an older person is in need of assistance.

*To help, you can:*

1. Provide the older person with the number of the Senior and Disability Service number: **1-800-392-0210**

**OR**

2. Make the call yourself if you believe the older person is unable or unlikely to call.

### All Calls Are Confidential

The Division of Senior and Disability Services will assess the older person's needs and help arrange for possible services, including personal care, household chore services, meals, transportation, adult day care, or caregiver assistance.

**Call the Division of Senior and Disability Services if you observe abuse or neglect of an older customer.**

**The number to call is:**

**1-800-392-0210.**

Call 2-1-1 for general questions  
and other community resources.



Schedule TJM-ER10b

# What To Look For

## **Communication**

Confusion, disorientation, forgetfulness, excessive reminiscing, unprovoked anger or hostility.

## **Economic Condition**

Confusion concerning money matters, expressed difficulty in paying bills, or inability to afford essential services or goods.

## **Social Condition**

Older person living alone, or otherwise isolated from social contacts. Signs of abuse, neglect, or exploitation.

## **Emotional Health**

Excessive statements of rejection, not eating or sleeping well, recent loss of spouse, relative, friend, or pet. Appears extremely anxious, fidgety, or withdrawn.

## **Personal Appearance**

Unkempt, dirty, inappropriate clothing for season, uncombed hair or unshaven, odorous, swelling of legs, or bruises.

## **Physical Limitations**

Severe difficulty in seeing, speaking, hearing or moving about.

## **Condition of Home**

In need of repair, neglected yard, old newspapers lying about, offensive odors or unattended pets.

