

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Tariff Filings of Union)
Electric Company d/b/a Ameren Missouri, to) Case No. ER-2011-0028
Increase Its Revenues for Retail Electric Service.)

**AMEREN MISSOURI’S REPLY TO STAFF RESPONSE TO
AMEREN MISSOURI’S RECONCILIATION FILING**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or the “Company”) and hereby replies to the above-referenced Staff Response. In this regard, the Company states as follows:

1. Staff’s Response indicates that the Staff has no objection to the reconciliation filed by Ameren Missouri on July 25, 2011, except that the Staff suggests that the three Exhibits A, B and C filed with the Staff’s Response be made a part of the Commission-approved reconciliation. The Company agrees.

2. The Company’s July 25, 2011 reconciliation was labeled “Exhibit A.” One of the documents the Staff recommends be included in the Commission-approved reconciliation is also labeled “Exhibit A.” Consequently, the Company is relabeling its reconciliation as “Attachment 1,” so as to avoid confusion. Also, the Staff afforded the Company the courtesy of pointing out typographical errors in the reconciliation submitted by the Company on July 25, 2011. The Company is also taking this opportunity to correct those typographical errors plus one additional typographical error that appears on the third sheet of the July 25, 2011 reconciliation. That sheet stated “Issue: ROE 10.75% per Company” and should have stated “Issue: ROE 10.7% per Company.” These corrections have no impact on any of the figures in the reconciliation.

WHEREFORE, the Company resubmits the reconciliation originally filed on July 25, 2011, modified only as outlined hereinabove, and that now includes as part thereof the three exhibits the Staff recommends be included therein, and prays that the Commission approve the

same as contemplated by Section 386.420.4, RSMo., as amended by S.B 48, signed by Governor Nixon on July 1, 2011 and effective on that same date.

Dated: August 2, 2011

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503

SMITH LEWIS, LLP

P.O. Box 918

Columbia, MO 65205-0918

(T) 573-443-3141

(F) 573-442-6686

lowery@smithlewis.com

Thomas M. Byrne, Mo. Bar #33340

Wendy K. Tatro, Mo. Bar # 60261

Union Electric Company

d/b/a Ameren Missouri

P.O. Box 66149 (MC 1310)

1901 Chouteau Avenue

St. Louis, MO 63166-6149

(T) 314-554-2514

(F) 314-554-4014

AmerenMoService@ameren.com

Attorneys for Union Electric Company

d/b/a Ameren Missouri

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 2nd day of August, 2011.

/s/James B. Lowery
James B. Lowery

Ameren Missouri
 MPSC Case No.ER-2011-0028
 Reconciliation of Issues Decided by the Commission
 Revenue Requirement Impact

ROE		Change Revenue Requirement
10.2% Per Order	173,225,030	
8.75% Per Staff	91,854,109	(81,370,921)
9.9% Per MIEC	156,341,962	(16,883,068)
10.0% Per MEG	162,061,336	(11,163,694)
10.7% Per Company	201,292,648	28,067,618
<u>Sioux Scrubbers</u>		
Disallowances Per Staff		(5,044,384)
<u>Taum Sauk Investment</u>		
100% Allowed in Rates Per Company		11,361,682
<u>Storm Cost O&M</u>		
Per Staff		(2,255,708)
Per MIEC		(2,209,371)
<u>Storm Cost Amortization</u>		
Allow Amortization Per Company		207,429
<u>Property Taxes Sioux Scrubbers & Taum Sauk</u>		
Disallow Per MIEC		(10,759,462)
<u>RES Compliance Cost</u>		
Per Staff		(397,514)
Per MIEC		(796,777)
<u>Amortization of Energy Efficiency</u>		
Per MIEC		(2,175,057)

AmerenUE (ER-2011-0028)

Issue: ROE 8.75% per MPSC Staff

Value: (\$81,370,921)

	Impact	
	Amount	Percent
Residential	(\$37,430,360)	-3.12%
Small General Service	(\$9,142,765)	-3.12%
Large General Service	(\$16,793,436)	-3.12%
Small Primary Service	(\$6,491,157)	-3.12%
Large Primary Service	(\$5,856,612)	-3.12%
Large Transmission Service	(\$4,572,429)	-3.12%
Lighting	(\$1,082,028)	-3.12%
MSD	(\$2,134)	-3.12%
Total	(\$81,370,921)	-3.12%

Issue: ROE 9.9% per MIEC

Value: (\$16,883,068)

	Impact	
	Amount	Percent
Residential	(\$7,766,156)	-0.65%
Small General Service	(\$1,896,967)	-0.65%
Large General Service	(\$3,484,349)	-0.65%
Small Primary Service	(\$1,346,804)	-0.65%
Large Primary Service	(\$1,215,146)	-0.65%
Large Transmission Service	(\$948,701)	-0.65%
Lighting	(\$224,502)	-0.65%
MSD	(\$443)	-0.65%
Total	(\$16,883,068)	-0.65%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: ROE 10.0% per MEG

Value: (\$11,163,694)

	Impact	
	Amount	Percent
Residential	(\$5,135,263)	-0.43%
Small General Service	(\$1,254,343)	-0.43%
Large General Service	(\$2,303,978)	-0.43%
Small Primary Service	(\$890,555)	-0.43%
Large Primary Service	(\$803,499)	-0.43%
Large Transmission Service	(\$627,315)	-0.43%
Lighting	(\$148,449)	-0.43%
MSD	(\$293)	-0.43%
Total	(\$11,163,694)	-0.43%

Issue: ROE 10.7% per Company

Value: \$28,067,618

	Impact	
	Amount	Percent
Residential	\$12,911,013	1.07%
Small General Service	\$3,153,653	1.07%
Large General Service	\$5,792,631	1.07%
Small Primary Service	\$2,239,022	1.07%
Large Primary Service	\$2,020,146	1.07%
Large Transmission Service	\$1,577,187	1.07%
Lighting	\$373,229	1.07%
MSD	\$736	1.07%
Total	\$28,067,618	1.07%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: Sioux Scrubbers Disallowances per MPSC Staff

Value: (\$5,044,384)

	Impact	
	Amount	Percent
Residential	(\$2,320,400)	-0.19%
Small General Service	(\$566,783)	-0.19%
Large General Service	(\$1,041,066)	-0.19%
Small Primary Service	(\$402,403)	-0.19%
Large Primary Service	(\$363,066)	-0.19%
Large Transmission Service	(\$283,456)	-0.19%
Lighting	(\$67,078)	-0.19%
MSD	(\$132)	-0.19%
Total	(\$5,044,384)	-0.19%

Issue: Taum Sauk, 100% Allowed in Rates per Company

Value: \$11,361,682

	Impact	
	Amount	Percent
Residential	\$5,226,337	0.44%
Small General Service	\$1,276,589	0.44%
Large General Service	\$2,344,839	0.44%
Small Primary Service	\$906,349	0.44%
Large Primary Service	\$817,749	0.44%
Large Transmission Service	\$638,440	0.44%
Lighting	\$151,082	0.44%
MSD	\$298	0.44%
Total	\$11,361,682	0.44%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: Storm Cost per MPSC Staff

Value: (\$2,255,708)

	Impact	
	Amount	Percent
Residential	(\$1,037,618)	-0.09%
Small General Service	(\$253,449)	-0.09%
Large General Service	(\$465,536)	-0.09%
Small Primary Service	(\$179,943)	-0.09%
Large Primary Service	(\$162,353)	-0.09%
Large Transmission Service	(\$126,754)	-0.09%
Lighting	(\$29,995)	-0.09%
MSD	(\$59)	-0.09%
Total	(\$2,255,708)	-0.09%

Issue: Storm Cost per MIEC

Value: (\$2,209,371)

	Impact	
	Amount	Percent
Residential	(\$1,016,303)	-0.08%
Small General Service	(\$248,243)	-0.08%
Large General Service	(\$455,973)	-0.08%
Small Primary Service	(\$176,247)	-0.08%
Large Primary Service	(\$159,018)	-0.08%
Large Transmission Service	(\$124,150)	-0.08%
Lighting	(\$29,379)	-0.08%
MSD	(\$58)	-0.08%
Total	(\$2,209,371)	-0.08%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: Allow Storm Cost Amorization per Company

Value: \$207,429

	Impact	
	Amount	Percent
Residential	\$95,417	0.01%
Small General Service	\$23,307	0.01%
Large General Service	\$42,809	0.01%
Small Primary Service	\$16,547	0.01%
Large Primary Service	\$14,930	0.01%
Large Transmission Service	\$11,656	0.01%
Lighting	\$2,758	0.01%
MSD	\$5	0.01%
Total	\$207,429	0.01%

Issue: Property Taxes, Disallow per MIEC

Value: (\$10,759,462)

	Impact	
	Amount	Percent
Residential	(\$4,949,318)	-0.41%
Small General Service	(\$1,208,924)	-0.41%
Large General Service	(\$2,220,552)	-0.41%
Small Primary Service	(\$858,309)	-0.41%
Large Primary Service	(\$774,404)	-0.41%
Large Transmission Service	(\$604,600)	-0.41%
Lighting	(\$143,074)	-0.41%
MSD	(\$282)	-0.41%
Total	(\$10,759,462)	-0.41%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: RES Compliance Cost per Staff

Value: (\$397,514)

	Impact	
	Amount	Percent
Residential	(\$182,855)	-0.02%
Small General Service	(\$44,664)	-0.02%
Large General Service	(\$82,039)	-0.02%
Small Primary Service	(\$31,711)	-0.02%
Large Primary Service	(\$28,611)	-0.02%
Large Transmission Service	(\$22,337)	-0.02%
Lighting	(\$5,286)	-0.02%
MSD	(\$10)	-0.02%
Total	(\$397,514)	-0.02%

Issue: RES Compliance Cost per MIEC

Value: (\$796,777)

	Impact	
	Amount	Percent
Residential	(\$366,515)	-0.03%
Small General Service	(\$89,525)	-0.03%
Large General Service	(\$164,440)	-0.03%
Small Primary Service	(\$63,561)	-0.03%
Large Primary Service	(\$57,347)	-0.03%
Large Transmission Service	(\$44,773)	-0.03%
Lighting	(\$10,595)	-0.03%
MSD	(\$21)	-0.03%
Total	(\$796,777)	-0.03%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

Issue: Amortization of Energy Efficiency per MIEC

Value: (\$2,175,057)

	Impact	
	Amount	Percent
Residential	(\$1,000,519)	-0.08%
Small General Service	(\$244,387)	-0.08%
Large General Service	(\$448,891)	-0.08%
Small Primary Service	(\$173,510)	-0.08%
Large Primary Service	(\$156,548)	-0.08%
Large Transmission Service	(\$122,222)	-0.08%
Lighting	(\$28,923)	-0.08%
MSD	(\$57)	-0.08%
Total	(\$2,175,057)	-0.08%

Issue: Lighting Pole and Span per Muni Group

Value: \$1,395,932

	Impact	
	Amount	Percent
Residential	\$642,124	0.05%
Small General Service	\$156,846	0.05%
Large General Service	\$288,094	0.05%
Small Primary Service	\$111,357	0.05%
Large Primary Service	\$100,471	0.05%
Large Transmission Service	\$78,441	0.05%
Lighting	\$18,562	0.05%
MSD	\$37	0.05%
Total	\$1,395,932	0.05%

Note: Percentages would have to be carried to additional decimal places to precisely meet revenue targets.

AmerenUE (ER-2011-0028)

	Current Revenues	Per Stip	Per Stip per Class		Revenue Neutral Class Totals	Rate Increase \$173,225,030	Total Revenue Requirement	
Res	\$1,099,447,166.33	\$21,989,000	\$21,989,000	2.00%	\$1,121,436,166	\$79,682,952	\$1,201,119,118	9.25%
SGS	\$278,879,746.21	(\$4,957,000)	(\$4,957,000)	-1.78%	\$273,922,746	\$19,463,411	\$293,386,157	5.20%
LGS	\$512,246,227.26	(\$12,624,000)	(\$9,104,747)	-1.78%	\$503,141,480	\$35,750,406	\$538,891,886	5.20%
SPS	\$197,998,232.50		(\$3,519,253)	-1.78%	\$194,478,980	\$13,818,583	\$208,297,563	5.20%
LPS	\$178,642,639	(\$3,175,000)	(\$3,175,000)	-1.78%	\$175,467,639	\$12,467,744	\$187,935,383	5.20%
LTS	\$139,471,742.46	(\$2,479,000)	(\$2,479,000)	-1.78%	\$136,992,742	\$9,733,934	\$146,726,677	5.20%
Lighting	\$31,171,217.69	\$1,247,000	\$1,247,000	4.00%	\$32,418,218	\$2,303,456	\$34,721,674	11.39%
MSD	\$63,940.32	\$0	\$0	0.00%	\$63,940	\$4,543	\$68,484	7.11%
	\$2,437,920,911.91	\$1,000	\$1,000		\$2,437,921,912	\$173,225,030	\$2,611,146,942	7.11%
	\$2,437,920,911.85					7.11%		

Exhibit A
File No. ER-2011-0028
Billing Determinants Supporting Class Revenue

Residential Class	
	Billing Units
Customer Charge	
Summer Bills	4,151,124.0
Winter Bills	8,302,248.0
TOD Bills	456.0
Low-income Surcharge	12,453,828.0
Energy Charge	
Summer kWh	4,755,929,765.8
On-peak	79,562.6
Off-peak	142,915.5
Winter kWh	
First 750 kWh	5,085,597,808.7
Over 750 kWh	4,132,102,893.9
On-peak	137,676.2
Off-peak	311,175.4

Small General Service Class	
	Billing Units
Customer Charge	
Summer Bills	
One-phase	360,264.0
Three-phase	150,616.0
Winter Bills	
One-phase	720,528.0
Three-phase	301,232.0
TOD Bills	
One-phase	6,864.0
Three-phase	1,452.0
6M	68,544.0
Low-income Surcharge	1,540,956.0
Energy Charge	
Summer kWh	1,220,475,371.6
On-peak	5,409,413.3
Off-peak	9,275,042.3
Winter kWh	
Base	1,840,511,093.5
Seasonal	470,541,981.2
On-peak	9,181,745.5
Off-peak	16,294,660.6

Large General Service Class	
	Billing Units
Customer Charge	
Summer Bills	39,892.0
Winter Bills	79,784.0
TOD Bills	374.0
Low-income Surcharge	120,050.0
Demand Charge (kW)	
Summer	8,386,671.0
Winter	15,508,521.5
Energy Charge	
Summer kWh	
First 150HU	1,144,186,273.6
Next 200HU	1,248,607,044.8
Over 350HU	528,367,817.6
On-peak	2,470,405.6
Off-peak	3,764,908.3
Winter kWh	
First 150HU	1,919,258,899.0
Next 200HU	2,068,642,100.3
Over 350HU	868,703,614.2
Seasonal	409,282,990.3
On-peak	3,973,950.5
Off-peak	6,179,365.1

Small Primary Service Class	
	Billing Units
Customer Charge	
Summer Bills	2,548.0
Winter Bills	5,096.0
TOD Bills	120.0
Low-income Surcharge	7,764.0
Demand Charge (kW)	
Summer	2,843,925.3
Winter	5,112,945.5
Energy Charge	
Summer kWh	
First 150HU	414,201,162.9
Next 200HU	510,870,866.0
Over 350HU	363,529,016.8
On-peak	7,728,225.3
Off-peak	11,594,432.1
Winter kWh	
First 150HU	693,083,896.0
Next 200HU	845,698,395.0
Over 350HU	605,024,947.7
Seasonal	163,753,286.9
On-peak	14,556,070.3
Off-peak	22,786,900.2
Reactive Charge	1,569,741.1
Rider b	840,338.7

Large Primary Service Class	
	Billing Units
Customer Charge	
Summer Bills	283.0
Winter Bills	567.0
TOD Bills	36.0
Low-income Surcharge	850.0
Demand Charge (kW)	
Summer	2,437,214.9
Winter	4,598,815.2
Energy Charge	
Summer kWh	
Energy	1,366,029,469.6
On-peak	26,905,443.1
Off-peak	53,316,560.4
Winter kWh	
Energy	2,456,505,129.0
On-peak	46,446,055.7
Off-peak	93,667,416.5
Reactive Charge	728,226.0
Rider b	
115 kW	462,851.7
69 kW	2,000,791.8

Large Transmission Service Class	
	Billing Units
Customer Charge	
Summer Bills	4.0
Winter Bills	8.0
Low-income Surcharge	12.0
Demand Charge (kW)	
Summer	1,904,083.6
Winter	3,802,149.0
Reactive Demand Charge (kW)	
Summer	0.0
Winter	0.0
Energy Charge	
Summer kWh	
Energy	1,373,777,043.0
Line Loss	48,082,196.7
Winter kWh	
Energy	2,752,103,764.2
Line Loss	96,323,631.7

**ER-2011-0028 Ameren Missouri
Lighting Class Billing Determinants - Exhibit B**

Description	Type	Lumens	Monthly Billing Units
5M RATE			
Horizontal - enclosed on existing wood pole	HPS	9500	11,455
Horizontal - enclosed on existing wood pole	HPS	25500	12,152
Horizontal - enclosed on existing wood pole	HPS	50000	2,936
Horizontal - enclosed on existing wood pole	MV	6800	13,334
Horizontal - enclosed on existing wood pole	MV	20000	5,271
Horizontal - enclosed on existing wood pole	MV	54000	73
Horizontal - enclosed on existing wood pole	MV	108000	1
Open bottom on existing wood pole	HPS	5800	4
Open bottom on existing wood pole	HPS	9500	50,495
Open bottom on existing wood pole	MV	3300	4,126
Open bottom on existing wood pole	MV	6800	20,396
			-
Post top including 17 foot post	HPS	9500	36,251
Post top including 17 foot post	MV	3300	221
Post top including 17 foot post	MV	6800	11,353
Directional	HPS	25500	3,263
Directional	HPS	50000	3,562
Directional	MH	34000	4,541
Directional	MH	100000	918
Directional	MV	20000	355
Directional	MV	54000	28
Prior to September 30, 1963			
Incandescent		1000	
Incandescent		2500	
Incandescent		4000	
Incandescent		6000	
Incandescent		10000	
Prior to April 9, 1986			
11,000 Lumens, Mercury Vapor, Post-Top		11000	9
11,000 Lumens, Mercury Vapor, Open Bottom		11000	258
11,000 Lumens, Mercury Vapor, Horizontal Enclosed		11000	535
42,000 Lumens, Mercury Vapor, Horizontal Enclosed		42000	-
5,800 Lumens, H.P. Sodium, Open Bottom		5800	-
16,000 Lumens, H.P. Sodium, Horizontal Enclosed		16000	-
34,200 Lumens, H.P. Sodium, Directional (2)		34200	8
140,000 Lumens, H.P. Sodium, Directional		140000	23
20,000 Lumens, Metal Halide, Directional		20000	-
			-
2500 INC Wood			1
6000 INC Wood			4
Prior to September 27, 1988			
Wood pole			14,779
Ornamental Concrete Pole			3,594
Steel Breakaway Pole			279
Standard Two-Conductor Overhead Cable			10,753
Underground Cable Installed In and Under Dirt			223,025
All Other Underground cable Installations			11,735

**ER-2011-0028 Ameren Missouri
Lighting Class Billing Determinants - Exhibit B**

6M RATE

Description	Type	Lumens	Monthly Billing Units
Metered service (cust charge per meter)			1,336
Energy charge (per kWh)			5,135,213
Customer charge per account			758
			-
Energy & Maintenance	HPS	9500	9,730
Energy & Maintenance	HPS	25500	649
Energy & Maintenance	HPS	50000	50
Energy & Maintenance	MH	5500	4
Energy & Maintenance	MH	12900	37
Energy & Maintenance	MV	3300	1
Energy & Maintenance	MV	6800	8,673
Energy & Maintenance	MV	11000	-
Energy & Maintenance	MV	20000	112
Energy & Maintenance	MV	54000	20
			-
Energy Only	HPS	9500	151
Energy Only	HPS	16000	4
Energy Only	HPS	25500	208
Energy Only	HPS	50000	27
Energy Only	MV	3300	81
Energy Only	MV	6800	203
Energy Only	MV	11000	-
Energy Only	MV	20000	139
Energy Only	MV	42000	-
Energy Only	MV	54000	20
5_6M			-
Customer Charge			81
Metered kWh			356,575

7M RATE

Description	Type	Lumens	
Incandescent and wood pole	INC	1000	6
Incandescent and wood pole	INC	2500	2
Incandescent and wood pole	INC	4000	8
Incandescent and wood pole	INC	6000	7
Incandescent and wood pole	INC	10000	2
Ornamental poles (opposed to wood) cost per light is			-
Incandescent and ornamental pole	INC	1000	-
Incandescent and ornamental pole	INC	2500	8
Incandescent and ornamental pole	INC	4000	16
Incandescent and ornamental pole	INC	6000	-
Incandescent and ornamental pole	INC	10000	-
Metered service (cust charge per meter)			4
Metered kWh			3,253

Energy Efficiency Billing Determinants

Residential	
Summer kWh	4,756,152,243.9
Winter kWh	9,218,149,554.2

Small General Service	
Summer Opt Out kwh	19,271
Winter Opt Out kwh	54,603
Summer Remaining kwh	1,235,140,556
Winter Remaining kwh	2,336,474,878

Large General Service	
Summer Opt Out kwh	2,201,320
Winter Opt Out kwh	3,663,260
Summer Remaining kwh	2,918,959,816
Winter Remaining kwh	5,262,224,344

Small Primary Service	
Summer Opt Out kwh	29,667,155
Winter Opt Out kwh	63,822,587
Summer Remaining kwh	1,258,933,891
Winter Remaining kwh	2,243,737,939

Large Power

Summer Opt Out kwh	309,738,639
Winter Opt Out kwh	582,756,427
Summer Remaining kwh	1,056,290,831
Winter Remaining kwh	1,873,748,702

Exhibit C