

November 13, 2001

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

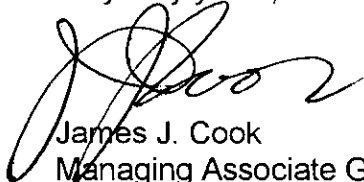
Re: MPSC Case No. EC-2002-1

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its signed **Affidavit of Gary S. Weiss** which goes with the filing of Union Electric Company's Motion to Establish a Test Year and Proposed Procedural Schedule which was hand delivered today for filing.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,



James J. Cook
Managing Associate General Counsel

JJC/mlh
Enclosures

FILED²
NOV 14 2001
Missouri Public
Service Commission



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

FILED²
NOV 14 2001
Missouri Public
Service Commission

The Staff of the Missouri Public
Service Commission,

Complainant,

v.

Union Electric Company, d/b/a
AmerenUE,

Respondent.

Case No. EC-2002-1

AFFIDAVIT OF GARY S. WEISS

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

Gary S. Weiss, being first duly sworn on his oath, states:

1. My name is Gary S. Weiss. I work in the City of St. Louis, Missouri and I am employed by Ameren Services Company as Supervisor of the Regulatory Accounting Section in the Controllers Function.

2. At various times during the MPSC Staff's audit I talked with them about their test year. They responded that their test year was the 12 months ended June 30, 2000. When I received their April 26, 2001 cost of service accounting run I called the Staff and suggested they move their test year to the 12 months ended December 31, 2000 as they had updated most of their rate base items through December 31, 2000. They responded that they did not have time to do this. I offered to give them a copy of my year end cost of service run for the 12 months ended December 31, 2000. I also pointed out

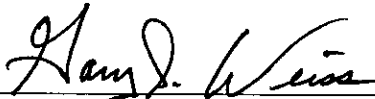
that there were some prior period entries recorded in December, 1999 that had to be adjusted out for the test year June 30, 2000 but would not be a problem if they moved to the December 31, 2000 test year.

3. Later as the MPSC Staff started providing me with workpapers, I noticed that even on the expense adjustment workpapers the data through December 31, 2000 was included and in some instances used to calculate the adjustment made to the June 2000 test year. They did attempt to make an adjustment to operating expenses to reflect the 12 months ended December 31, 2000 labor expenses. They also used the actual fuel cost for the year 2000 to calculate their fuel expense for weather normalized and adjusted kWh sales. Throughout the spring and early summer, many of the MPSC Staff's data requests were being updated with current data. By the time the MPSC Staff completed their on site audit they actually had information through April and/or May of 2001. The June 2001 data was provided in late July or early August; and the September 2001 filing of the last sharing period earnings report, included a detailed cost of service accounting run along with workpapers.

4. By not moving to the 12 months ended June 2001, the MPSC Staff is ignoring some significant increases in expenses. For example the electric labor increased more than \$15 million without annualizing the wage increases that took effect during this period; the contract power plant maintenance increased more than \$5 million; the Missouri distribution other expenses, includes tree trimming, increased over \$5 million; and the injuries and damages expense increase by more than \$10 million. In total, the Company estimates that the normalized electric net operating income decreased \$50 to

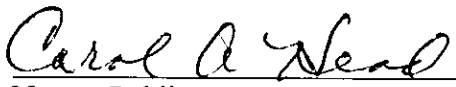
\$75 million for the 12 months ended June 30, 2001 compared to the 12 months ended June 30, 2000.

5. I hereby swear and affirm that the information contained in this affidavit is true and correct.



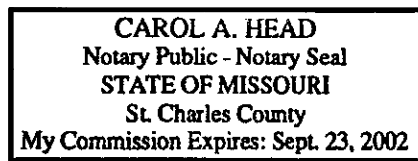
Gary S. Weiss

Subscribed and sworn to before me this 13th day of November, 2001.



Notary Public

My Commission expires: 9-23-2002



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first class U.S. mail, postage prepaid, on this 13th day of November, 2001, on the following parties of record:

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65101

Steve Dottheim
Chief Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Dennis Frey
Assistant General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101

R. Larry Sherwin
Assistant Vice President
Regulatory Administration
Laclede Gas Company
720 Olive Street, Room 1415
St. Louis, MO 63101

Ronald Molteni
Assistant Attorney General
Supreme Court Building
221 West High Street
P.O. Box 899
Jefferson City, MO 65102

John B. Coffman
Deputy Public Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Robert C. Johnson, Esq.
Lisa C. Langeneckert, Esq.
Law Office of Robert C. Johnson
720 Olive Street, Suite 2400
St. Louis, MO 63101

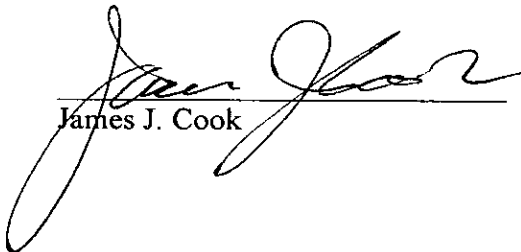
Diana M. Vulysteke
Bryan Cave LLP
One Metropolitan Square
211 North Broadway, Ste. 3600
St. Louis, MO 63102-2750

Robin E. Fulton
Schnapp, Fulton, Fall, Silver &
Reid, L.L.C.
135 East Main Street
P.O. Box 151
Fredericktown, MO 63645

Michael C. Pendergast
Assistant Vice President &
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101

Tim Rush
Kansas City Power & Light Company
1201 Walnut
Kansas City, MO 64141

James M. Fischer
Fischer & Dority, P.C.
101 Madison, Suite 400
Jefferson City, MO 65101



James J. Cook