

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

In the Matter of an Investigation of the
Relationship Between Utilities With
Credit Rating Agencies.

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Docket No. EW-2007-0379

AFFIDAVIT OF JERRE E. BIRDSONG

STATE OF MISSOURI

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) ss

CITY OF ST. LOUIS

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Jerre E. Birdsong, being first duly sworn on his oath, states:

1. My name is Jerre E. Birdsong. I work in St. Louis, Missouri and I am employed by Ameren Services Company as Vice-President and Treasurer.
2. I have reviewed the subpoena duces tecum served on Ameren Services Company on or about April 9, 2007 (the "Subpoena"), including the definition of "company" provided for in Attachment A to the Subpoena.
3. Ameren Services Company provides administrative support services for each corporate entity included in the definition of "company" in Attachment A to the Subpoena, and has possession, custody and control of the documents that are responsive to the Subpoena for all such companies. I am an officer in each such corporate entity, although my employer is Ameren Services Company. When I use the term "company" this Affidavit, I am using it as that term is defined in Attachment A to the Subpoena.
4. I supervised the process of assembling documents responsive to the Subpoena. I did so by identifying company personnel who have the most contact with credit rating agencies. Those personnel were contacted and responsive documents were

obtained from them and then assembled for production to Commissioners Gaw and Clayton under my supervision. The personnel from whom documents were obtained are myself, Lee Nickloy, and Warner Baxter, who are the company's primary contacts with the credit ratings agencies, and also the following other subject matter experts have also had communications with credit rating agencies at various times: Michael Moehn, Dan Cole, Marty Lyons, Craig Nelson, Bruce Steinke, Darrell Hughes, Mike O'Bryan, and Maureen Borkowski.

5. To the best of my knowledge, information and belief, the documents provided by delivery to Commissioners Gaw and Clayton at the on-the-record presentation held in this docket on May 2, 2007 ("Bates stamped" as document numbers 1 through 4,869), together with the documents delivered concurrently with this Affidavit ("Bates" stamped" as document numbers 4,870 through 17,635), constitute all of the documents as of the date of this Affidavit that are responsive to the Subpoena. E-mails that had previously been archived and that are to or from the individuals listed in paragraph 4 that could contain information that could be responsive to the Subpoena have been retrieved and are included. The Company's IT Department began archiving e-mails in approximately November 2006. These archived e-mails may be duplicative of other documents provided in response to the Subpoena.

6. The documents provided on May 2, 2007 and concurrently with this Affidavit are all kept in the regular course of business by Ameren Services Company, and it was the regular course of business for Ameren Services Company employees to make or keep such documents.

FURTHER AFFIANT SAYETH NOT.

Jerre E. Birdsong
Jerre E. Birdsong

Subscribed and sworn to before me this 23rd day of May, 2007.

Barbara Lungwitz
Notary Public

My commission expires:

