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BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Filed  
March 24, 2015  
Data Center  
Missouri Public  
Service Commission

In the Matter of Union Electric Company, d/b/a )  
Ameren Missouri's Tariff to Increase Its Revenues ) Case No. ER-2014-0258  
for Electric Service )

**WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.'S  
AMENDED MOTION TO SUBSTITUTE COMPLETED SCHEDULES  
TO PREFILED TESTIMONY  
AND MOTION FOR EXPEDITED TREATMENT**

Pursuant to 4 240-2.080, Wal-Mart Stores East, LP, and Sam's East, Inc.,  
(collectively "Walmart") submit this amended motion ("Amended Motion") to substitute  
completed schedules for those previously filed in this docket.

Walmart also requests expedited treatment of this Amended Motion. In support of  
this Amended Motion Walmart states as follows:

1. On December 19, 2014, the Direct Testimony And Schedules Of Steve W.  
Chriss were filed on behalf of Walmart. Attached to Mr. Chriss' testimony were hard  
copies of Schedules SWC-8 through SWC-14. The original electronic versions of  
Schedules SWC-8 through SWC-14 were subsequently circulated to all parties on  
December 23, 2014.

2. It has come to Walmart's attention that the schedules attached to Mr.  
Chriss' testimony were incomplete and do not include all of the information from the  
underlying electronic schedules. Attached are hard copies of the complete electronic  
files that were circulated to the parties on December 23, 2014.

3. By this Amended Motion Walmart seeks to have the attached schedules  
accepted for filing and substituted in place of those originally attached to Mr. Chriss'  
testimony. There are no substantive differences between the original schedules  
attached to Mr. Chriss' testimony and those attached to this Amended Motion. However,

WM Exhibit No 754  
Date 3-04-15 Reporter XF  
File No ER-2014-0258

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the attached schedules are complete, whereas those attached to Mr. Chriss' testimony were incomplete.

4. Rebuttal testimony is due in this case on January 16, 2015. Because the rebuttal filing date is quickly approaching, expedited treatment of this Amended Motion is essential. Without expedited treatment additional rebuttal testimony is likely addressing differences between the hard copies and electronic copies of Schedules SWC-8 through SWC-14. Substituting the attached schedules will conform the hard copies filed of record in this docket with the electronic files circulated to the parties. Judicial economy will be promoted by avoiding the need for parties to address the issue in rebuttal testimony, as well as avoiding confusion that may arise at the evidentiary hearing. No party will be prejudiced by the requested relief since the parties have had the complete electronic schedules since December 23, 2014.

5. The initial Wal-Mart Stores East, LP, And Sam's East, Inc.'s Motion To Substitute Completed Schedules To Prefiled Testimony And Motion For Expedited Treatment ("Motion") was filed January 6, 2015. Upon filing the original Motion, the undersigned counsel determined that one of the columns on Schedule SWC-14 failed to print. This Amended Motion is being filed to provide the Commission and the parties with accurate hard copies of Mr. Chriss' schedules.

6. For these reasons, Walmart requests that the Commission act upon this Amended Motion as soon as possible so that the corrected schedules are available prior to the filing of rebuttal testimony.

**WAL-MART STORES EAST, LP,  
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WHEREFORE, Wal-Mart Stores East, LP, and Sam's East, Inc., respectfully request that the Commission expeditiously grant this Amended Motion and accept the attached Schedules SWC-8 through SWC-14 as substitutes for the original schedules attached to Mr. Chriss' December 19, 2014, testimony.

Dated this 6th day of January, 2015.

Respectfully submitted,

By

  
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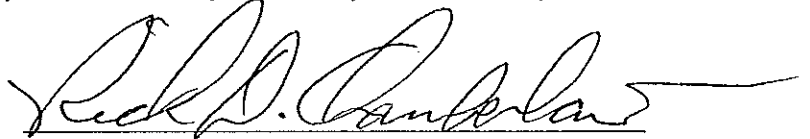
ATTORNEYS FOR WAL-MART STORES  
EAST, LP, AND SAM'S EAST, INC.

WAL-MART STORES EAST, LP,  
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CERTIFICATE OF SERVICE

The undersigned certifies that on January 6, 2015, a true and correct copy of the foregoing Motion was served by U.S. mail, postage prepaid, or by electronic mail addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "Rick D. Campbell", with a long horizontal flourish extending to the right.

### Calculation of Rate of Return Index by Customer Class

Customer Class	Rate of Return (%) (1)	Rate of Return Index Value (2) (1) / Total Missouri
Residential	2.73%	0.62
Small General Service	6.12%	1.38
Large General Service/Small Primary	7.57%	1.71
Large Primary	4.22%	0.95
Large Transmission	1.64%	0.37
Lighting	4.58%	1.03
<b>Total Missouri</b>	<b>4.44%</b>	<b>1.00</b>

Source: Schedule WMW-1

**Calculation of Large General Service ("LGS") and Small Primary Service ("SP") Rate of Return Index Values**

Case	LGS/SP Rate of Return (%) (1)	Total Missouri Rate of Return (%) (2)	Rate of Return Index Value (3) (1) / (3)
ER-2007-0002 (LGS)	5.86%	2.74%	2.14
ER-2007-0002 (SP)	4.47%	2.74%	1.63
ER-2008-0318	7.01%	4.06%	1.73
ER-2010-0036	6.12%	1.89%	3.24
ER-2011-0028	8.26%	4.59%	1.80
ER-2012-0166	6.32%	2.89%	2.19
Present Case	7.57%	4.44%	1.71

Sources:

- Case No. ER-2007-0002, Exhibit WMW-1
- Case No. ER-2008-0318, Exhibit WMW-E1
- Case No. ER-2010-0036, Exhibit WMW-E1
- Case No. ER-2011-0028, Exhibit WMW-E1
- Case No. ER-2012-0166, Exhibit WMW-E1

**Demonstration of Proposed Revenue Allocation Methodology**

**Revenue Requirement Decrease From Proposed** **\$ (37,503,000)**

Customer Class	Current Revenues	Proposed Increase	Allocation of Proposed Increase	Revenue Neutral Shift, Ameren COSS	25 Percent Movement	Allocation of Overall RR Reduction	Net Revenue Change	Amount to Mitigate	
	(\$)	(\$)	(%)	(\$)	(\$)	(\$)	(\$)	(\$)	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
			(2) / Total		(4) x 0.25	RRR x (3)	(2) + (5) + (6)	(7) / (1)	
								(8) - (2)	
Residential	\$ 1,230,497,365	\$ 118,691,987	45.0%	\$ 62,576,000	\$ 15,644,000	\$ (16,860,154)	\$ 117,475,833	9.55%	\$ -
Small General Service	\$ 302,777,223	\$ 29,203,178	11.1%	\$ (13,391,000)	\$ (3,347,750)	\$ (4,148,301)	\$ 21,707,127	7.17%	\$ -
Large General Service	\$ 576,863,372	\$ 55,613,798	21.1%	\$ (42,943,155)	\$ (10,735,789)	\$ (7,899,920)	\$ 36,978,089	6.41%	\$ -
Small Primary	\$ 227,596,391	\$ 21,940,323	8.3%	\$ (16,942,845)	\$ (4,235,711)	\$ (3,116,615)	\$ 14,587,997	6.41%	\$ -
Large Primary	\$ 202,782,047	\$ 19,541,992	7.4%	\$ 1,030,000	\$ 257,500	\$ (2,775,933)	\$ 17,023,559	8.40%	\$ -
Large Transmission	\$ 159,333,049	\$ 15,361,303	5.8%	\$ 9,830,000	\$ 2,457,500	\$ (2,182,068)	\$ 15,636,735	9.81%	\$ 275,432
Lighting	\$ 37,876,368	\$ 3,653,717	1.4%	\$ (158,000)	\$ (39,500)	\$ (519,009)	\$ 3,095,208	8.17%	\$ -
MSD	\$ 73,018	\$ 7,044	0.0%	\$ -	\$ -	\$ (1,001)	\$ 6,043	8.28%	\$ -
<b>Total</b>	<b>\$ 2,737,798,833</b>	<b>\$ 264,013,342</b>					<b>\$ 226,510,592</b>		

Note: The LGS and SP revenue neutral shifts sum to (\$59,886,000) per the COSS and are allocated on the basis of current revenues.

Sources:

(1) - (2): Direct Testimony of William R. Davis, Table 4

(4): UE\_DIR-UE-DIR\_007-Att-MO ECCOS\_2015 Filed 7\_3\_14.xls, SCH 2

**Determination of LGS and SP Cost of Service and Revenues by Customer, Demand, and Energy**

Function	Cost of Service by Function		Large General Service		Small Primary	
	Class Cost of Service		Revenue by Function		Revenue by Function	
	(\$000)	(%)	(\$000)	(%)	(\$000)	(%)
	(1)	(2)	(3)	(4)	(5)	(6)
	(1) / Total		(3) / Total		(5) / Total	
Customer	\$ 17,957	2.2%	\$ 12,109	1.9%	\$ 2,631	1.1%
Production - Demand	\$ 376,932	46.3%				
Transmission - Demand	\$ 35,600	4.4%				
Distribution - Demand	\$ 124,989	15.4%				
Total Demand	\$ 537,521	66.1%	\$ 73,357	11.7%	\$ 20,867	8.4%
Energy	\$ 258,015	31.7%	\$ 542,149	86.4%	\$ 225,016	90.5%
<b>Total Non-EE Revenue</b>	<b>\$ 813,493</b>	<b>166%</b>	<b>\$ 627,614</b>	<b>100%</b>	<b>\$ 248,514</b>	<b>100%</b>

Sources:

Schedule SWC-12 and Schedule SWC-13

William M. Warwick Workpapers, Unbundled



**Large General Service Rate Comparison  
Ameren Missouri  
Weather Normalized-12 months ending March 2014  
Growth to December 2014**

<u>Billing Components</u>				
<u>Summer (June - September)</u>				
	<u>Rate</u>	<u>Units</u>	<u>\$</u>	
Customer Charge	Per Month	\$88.32	41,449	\$3,660,804
Customer Charge TOD	Per Month	\$107.82	164	\$17,637
Low Income Program Charge	Per Month	\$0.00	41,613	\$0
<u>Energy Charge (\$ per kWh)</u>				
First 150 kWh per KW		9.89 ¢	1,163,123,672	\$115,032,931
Next 200 kWh per KW		7.44 ¢	1,263,783,662	\$94,025,504
All over 350 kWh per KW		5.00 ¢	504,528,272	\$25,226,414
TOD On Peak Adjust, per Kwh		1.17 ¢	5,589,865	\$65,401
TOD Off Peak Adjust, per Kwh		-0.66 ¢	11,780,036	-\$77,748
Energy Efficiency per Kwh		0.08 ¢	2,931,435,606	\$2,345,148
Opt Out EE per Kwh		-0.08 ¢	61,561,735	-\$49,249
<u>Demand</u>				
Per KW of Billing Demand		\$4.62	8,516,045	\$39,344,128
<u>Winter (October - May)</u>				
Customer Charge	Per Month	\$88.32	82,853	\$7,317,570
Customer Charge TOD	Per Month	\$107.82	312	\$33,631
Low Income Program Charge	Per Month	\$0.00	83,165	\$0
<u>Energy Charge (\$ per kWh)</u>				
First 150 kWh per KW		6.23 ¢	1,894,055,751	\$117,999,673
Next 200 kWh per KW		4.62 ¢	2,061,036,697	\$95,219,895
All over 350 kWh per KW		3.63 ¢	848,824,811	\$30,812,341
Seasonal Energy Charge		3.83 ¢	437,409,324	\$15,877,958
TOD On Peak Adjust, per Kwh		0.35 ¢	9,747,861	\$30,618
TOD Off Peak Adjust, per Kwh		-0.20 ¢	18,866,345	-\$37,733
Energy Efficiency per Kwh		0.05 ¢	5,241,326,584	\$2,620,663
Opt Out EE per Kwh		-0.05 ¢	106,807,282	-\$53,404
<u>Demand</u>				
Per KW of Billing Demand		\$1.71	16,053,326	\$27,451,187
			8,172,762,190	\$576,863,372

Target Increase	\$632,510,082	9.78%	Proposed Rate					Variation rounded minus not rol
	\$96.96	\$4,018,926	96.96	\$4,018,798				
	\$118.34	\$19,358	118.36	\$19,362				
	\$0.00	\$0	0.00	\$0				
	10.86	\$126,315,231	10.857	\$126,282,117				\$33,114
	8.17	\$103,251,125	8.168	\$103,220,353				\$30,772
	5.49	\$27,698,602	5.489	\$27,693,330				\$5,272
	1.28	\$71,550	1.28	\$71,797				-\$247
	-0.72	-\$84,816	-0.72	-\$85,351				\$535
	0.08	\$2,345,148	0.08	\$2,277,922				\$67,227
	-0.08	-\$49,249	-0.08	-\$47,838				-\$1,412
	\$5.07	\$43,176,349	5.072	\$43,191,630				
	\$96.96	\$8,033,419	96.96	\$8,033,163				
	\$118.34	\$36,912	118.36	\$36,920				
	\$0.00	\$0	0.00	\$0				
	6.84	\$129,553,413	6.839	\$129,538,980				\$14,434
		\$104,288,457	5.072	\$104,531,544				-\$243,088
		\$33,698,345	3.985	\$33,825,510				-\$127,165
		\$17,365,150	3.985	\$17,430,680				-\$65,530
	0.38	\$33,242	0.38	\$33,612				-\$370
	-0.22	-\$41,506	-0.22	-\$41,423				-\$83
	0.05	\$2,620,663	0.0456	\$2,392,056				\$228,608
	-0.05	-\$53,404	-0.0456	-\$48,745				-\$4,659
	\$1.88	\$30,180,253	1.877	\$30,135,667				
		\$632,477,169		\$632,510,082				
		\$55,613,798						
Variance		-\$32,913		\$0				

EE	Pro-MEEIA
Summer	\$2,295,899
Winter	\$2,567,260
	\$4,863,159

Total Pre-MEEIA
\$4,573,395
\$2,230,084
\$2,343,310

	KWH	Allocation for Seasons
Summer	2,869,873,871	\$275,912,530
Winter	5,134,519,303	\$289,921,200
Total		\$565,833,730

**Small Primary Service Rate Comparison  
Ameren Missouri  
Weather Normalized-12 months ending March 2014  
Growth to December 2014**

<b>Billing Components</b>			
	<b>Rate</b>	<b>Units</b>	<b>\$</b>
<b>Summer (June - September)</b>			
Customer Charge Per Month	\$299.60	2,661	\$773,221
Customer Charge TOD Per Month	\$319.10	80	\$25,440
Low Income Program Ch Per Month	\$0.00	2,661	\$0
<b>Energy Charge (\$ per kWh)</b>			
First 150 kWh per KW	9.56 ¢	426,374,728	\$40,761,424
Next 200 kWh per KW	7.20 ¢	518,519,003	\$37,333,368
All over 350 kWh per KW	4.83 ¢	362,631,332	\$17,515,093
TOD On Peak Adjust. per Kwh	0.85 ¢	14,767,819	\$125,526
TOD Off Peak Adjust. per Kwh	-0.48 ¢	30,611,835	-\$146,937
Energy Efficiency per Kwh	0.09 ¢	1,307,525,062	\$1,176,773
Opt Out EE per Kwh	-0.09 ¢	85,416,838	-\$76,875
<b>Demand</b>			
Per KW of Billing Demand	\$3.82	2,904,959	\$11,096,944
Billing Kvars	35 ¢	539,541	\$188,839
Rider B 34kv Per KW	114 ¢	325,931	-\$371,581
Rider B 138kv Per KW	135 ¢	2,354	-\$3,178
<b>Winter (October - May)</b>			
Customer Charge Per Month	\$299.60	5,179	\$1,551,647
Customer Charge TOD Per Month	\$319.10	155	\$49,579
Low Income Program Ch Per Month	\$0.00	5,334	\$0
<b>Energy Charge (\$ per kWh)</b>			
First 150 kWh per KW	6.02 ¢	705,889,897	\$42,494,572
Next 200 kWh per KW	4.47 ¢	869,363,383	\$38,880,543
All over 350 kWh per KW	3.50 ¢	823,212,439	\$21,812,435
Seasonal Energy Charge	3.50 ¢	175,041,508	\$6,126,453
TOD On Peak Adjust. per Kwh	0.32 ¢	24,528,233	\$78,490
TOD Off Peak Adjust. per Kwh	-0.17 ¢	51,839,857	-\$88,128
Energy Efficiency per Kwh	0.08 ¢	2,373,507,227	\$1,424,104
Opt Out EE per Kwh	-0.06 ¢	166,671,696	-\$100,003
<b>Demand</b>			
Per KW of Billing Demand	\$1.39	5,321,815	\$7,397,322
Billing Kvars	35 ¢	837,881	\$293,258
Rider B 34kv Per KW	114 ¢	610,802	-\$696,315
Rider B 138kv Per KW	135 ¢	4,180	-\$5,642
		<b>3,681,032,289</b>	<b>\$227,596,391</b>

Target	\$249,551,313				
Increase	0.09817				
Proposed Rate					
	\$18,500	\$847,807	269.60	\$773,221	-\$74,586
	\$49,951	\$27,894	350.43	\$27,938	\$44
	\$0.00	\$0	0.00	\$0	
	10.50	\$44,769,346	10,499	\$44,763,037	-\$6,309
	7.20	\$41,086,705	7,907	\$40,998,444	-\$88,261
	5.30	\$19,219,461	5,304	\$19,234,578	\$15,117
	0.93	\$137,341	0.93	\$137,850	\$509
	-0.53	-\$162,249	-0.53	-\$161,362	\$881
	0.09	\$1,176,773	0.09	\$1,162,152	-\$14,621
	-0.09	-\$76,875	-0.09	-\$75,920	\$955
	\$4.20	\$12,200,828	4.20	\$12,186,348	-\$14,480
	35 ¢	\$205,025	38.44	\$207,378	\$2,352
	114 ¢	-\$407,414	125.19	-\$408,038	-\$624
	135 ¢	-\$3,484	148.25	-\$3,460	-\$24
	\$299.60	\$1,701,322	329.01	\$1,703,975	\$2,653
	\$319.10	\$54,358	350.43	\$54,443	\$85
	\$0.00	\$0	0.00	\$0	
	6.02	\$46,659,322	6,611	\$46,666,331	\$7,009
	4.47	\$42,685,742	4,909	\$42,675,544	-\$10,198
	3.50	\$23,931,358	3,844	\$23,953,797	\$22,439
	3.50	\$6,721,594	3,844	\$6,727,896	\$6,302
	0.35	\$85,849	0.35	\$86,166	\$317
	-0.19	-\$98,496	-0.19	-\$96,779	\$1,716
	0.05	\$1,188,754	0.05	\$1,276,821	\$88,067
	-0.05	-\$83,336	-0.05	-\$89,660	-\$6,325
	\$1.53	\$8,142,376	1.53	\$8,123,529	-\$18,847
	35 ¢	\$318,395	38.44	\$322,048	\$3,653
	114 ¢	-\$763,503	125.19	-\$764,673	-\$1,170
	135 ¢	-\$6,186	148.25	-\$6,198	-\$11
		\$249,538,714		\$249,475,405	
Variance		-\$14,599		-\$75,908	

EE		Pre-MEEIA
Summer		\$1,099,898
Winter		\$1,324,101
		\$2,423,999

	KWH	Allocation for Seasons	Total Pre-MEEIA
Summer	1,222,108,424	\$107,599,416	\$2,273,392
Winter	2,206,835,531	\$117,597,091	\$1,086,232
Total		\$225,196,507	\$1,187,160

Calculation of Effective Demand Rates, Proposed LGS Summer

(1)	Rate	LGS Summer
(2)	Customer Demand	1,000 kW
(3)	LGS Summer Non-EE Revenues	\$ 304,466,325
(4)	% Energy, Cost of Service Study	31.7%
(5)	(3) x (4) Non-EE Energy Revenues, COS	\$ 96,567,369
(6)	Total Billing kWh	2,931,435,606 kWh
(7)	(5) / (6) Cost of Service Energy Rate	\$ 0.03294 /kWh
(8)	Proposed Billing Demand Rate (BDR)	\$ 5.07 /kW
(9)	% Demand, Cost of Service Study	66.1%
(10)	(3) x (9) Non-EE Demand Revenues, COS	\$ 201,178,183
(11)	Total Billing kW	8,516,045
(12)	(10) / (11) Full Cost Demand Rate (FCDR)	\$ 23.62 /kW

(13)	Hours of Use	kWh	Load Factor (%)	Proposed Energy Rate (\$/kWh)	Cost of Service Energy Rate (\$/kWh)	Demand Portion of Energy Rate (\$/kWh)	Billed Demand Cost from Energy Rate (\$)	Effective Demand Rate from Energy Rate (\$/kW)	Total Demand Rate (\$/kW)	Effective Subsidy (Received) / Paid (\$/kW)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
				ExSWC-7		(4) - (5)		(7) / kW Demand	(8) + BDR	(9) - FCDR
	1	1,000	0.1%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 76	\$ 0.08	\$ 5.15	\$ (18.48)
	72	72,000	10.0%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 5,447	\$ 5.45	\$ 10.52	\$ (13.11)
	144	144,000	20.0%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 10,895	\$ 10.89	\$ 15.96	\$ (7.66)
	150	150,000	20.8%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 11,349	\$ 11.23	\$ 16.42	\$ (7.20)
	216	216,000	30.0%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 14,567	\$ 14.57	\$ 19.64	\$ (3.99)
	288	288,000	40.0%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,077	\$ 18.08	\$ 23.15	\$ (0.48)
	297	297,000	41.3%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,516	\$ 18.52	\$ 23.59	\$ (0.04)
	298	298,000	41.4%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,565	\$ 18.56	\$ 23.63	\$ 0.01
	350	350,000	48.6%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 21,100	\$ 21.10	\$ 26.17	\$ 2.55
	360	360,000	50.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 21,320	\$ 21.32	\$ 26.39	\$ 2.77
	432	432,000	60.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 22,901	\$ 22.90	\$ 27.97	\$ 4.35
	504	504,000	70.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 24,482	\$ 24.48	\$ 29.55	\$ 5.93
	576	576,000	80.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 26,063	\$ 26.06	\$ 31.13	\$ 7.51
	648	648,000	90.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 27,644	\$ 27.64	\$ 32.71	\$ 9.09
	720	720,000	100.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 29,225	\$ 29.22	\$ 34.29	\$ 10.67

Sources:  
Schedule SWC-11  
Schedule SWC-12