

Dean Cooper

From: Donna Hawley [hawleyd@fidnet.com]
Sent: Thursday, August 26, 2010 8:49 PM
To: Gary Duffy
Cc: Dean Cooper
Subject: Data Request Series 5
Attachments: Data Request Series 5 to Rolla.doc

Attached is the Data Request Series 5 for Rolla.

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Data Request Series 5 – Rolla

5.01 – Rolla has indicated possessing no documentation that supports the reference to the AmerenUE April 2006 letter (regarding costs to retire the 35kV line in para 5 of pg 4-4 in the RW Beck Engineering Study). Explain how those statements were incorporated into the Study as a verified risk to Alternative 3C. Detail who made the statement to RW Beck and who authorized its incorporation into the evaluation and elimination of Alternative 3C.

5.02 List all meeting with RW Beck staff regarding the engineering study released in 2007. Provide dates, attendees and meeting notes or memorandum.

5.03 a. Copy of all Task Authorizations, amendments, or change orders issued for the August 2006 RW Beck Professional Services Agreement (PSA) with RMU.

b. RMU meeting minutes showing approval for the Task Authorizations.

c. Copy of all Scope of Services and modifications for each Task Authorization.

d. List of all PSA counterparts as defined in Section 20(e) of that agreement.

e. Provide a list of all Work Products prepared by RW Beck, including drafts.

f. List all modifications or revisions to each Work Product along with an explanation as to why those changes were made.

5.04 a. Copy of the Request for Qualification (RFQ) that was awarded to RW Beck in 2006.

b. List of all companies receiving a RFQ and the date sent.

c. List of all responses to the RFQ.

5.05 Provide a list of all payments made to RW Beck for services under the PSA and a copy of all invoices, along with all progress reports and transmittal letters.

5.06 Copy of power project planning schedule resulting from the PSA. Include completion date estimates for each phase and progress to date for each.

5.07 Copy of all bids awarded, showing bid sheets and change orders for all construction, supplies, labor, services, etc..., for the Power Project.

5.08 Copy of all RMU environmental impact studies since 2000.

5.09 Identify what Load Level established in the Study that the RMU system was operating under for the years 2007 through 2010. Specifically identify any system data that supports that Load Level for each year.

5.10 List and describe all RMU data reports or documents as defined in the PSA, Section 13 that were provided to RW Beck.

5.11 List all meetings with the Rolla Mayor or City council where Alternative 3D or the Power Project was discussed in depth. Provide copies of all notes or presentations for those meetings.

5.12 a. Copies of all monthly statements and payments for the lease purchase funds held in the Cayman Islands by UMB for RMU since December 2008 (except for previously provided June 2010 statement).

b. Explain both Transactions on page 6 of the UMB Investment Summary for June 2010 that was previously provided.

5.13 a. Explain Columns titled "Adjustment" and "Adjustment Description" in the MAMU Lease Purchase Revised Schedule of Base Rentals. Provide calculation for the dollars amounts in the Adjustment column.

b. Provide a copy of all previous Schedules of Base Rentals for the MAMU Lease Purchase.

5.14 Copy of all RMU MoPEP monthly billing from Jan 2007 to Dec 2009 and all annual statements or true ups.

5.15 a. Explain why RMU included two new distribution substations (Sally Road and Rolla Street) in the Study analysis and projections.

b. Indicate area within the City of Rolla that is to be served by each new distribution substation.

c. Provide all information, specifically, that was used to assess growth in each area to be served.

5.16 Does RMU report or maintain reliability measures and statistics for Rolla? If so, please provide this data for the years 2000 to 2010.

5.17 a. Provide RMU's understanding of the MoPEP2 cooperative being discussed at MJMEUC. What is its purpose and which towns will be involved.

b. Indicate whether the improved RMU power system and dual bulk substation will be utilized by MJMEUC, MoPEP or MoPEP2 and whether RMU expects to earn credits for wholesale services against the Rolla wholesale power or transmission bills and how much.

c. If RMU expects to earn revenue, please indicate how much and for what services.

5.18 Why did RMU and Ameren wait until 2010 to seek MoPSC approval for the Rolla and St. James purchase of the Phelps substation and associated 35 kV lines?

5.19 a. Why did RMU leave out the availability of the 17 diesel generators for use on the few occasions when an extended outage might occur on circuits 71, 72 or 73?

b. How much does it cost per hour to run any one of the 17 diesel generators in 2010?

c. Why did RMU not run the diesel generators during any of the outages during June or July this year?

5.20 a. Did RMU perform or request that RW Beck perform, an updated cost-benefit analysis in 2008 before requesting MAMU financing? If so provide a copy. If not, explain why.

b. Did RMU or RW Beck perform an updated cost-benefit analysis after entering into the MAMU Lease Purchase agreement in 2008? If so, provide a copy. If not, explain why.

5.21 a. When was St. James brought into the AmerenUE negotiations for the Phelps substation and circuits?

- b. Did RMU or RW Beck perform a new cost-benefit analysis after St. James agreed to purchase part of the AmerenUE Phelps assets? If so, please provide a copy. If not, explain why.
- 5.22 a. What modifications were made to the Study's Alternative 3D that increased the estimated cost from approximately \$10 million to the current lease purchase amount of approximately \$18 million? List all modifications and estimated cost.
- b. Did RMU or RW Beck perform a new cost-benefit analysis with the modifications? If so, please provide. If not, explain why.
- 5.23 Copy of all Briggs and Stratton RMU bills for the last 3 years of operation. Provide an estimate of Briggs share of RMU coincident peak demand for each year.
- 5.24 Copy of all Cantex RMU bills for the last 3 years of operation. Provide an estimate of Briggs share of RMU coincident peak demand for each year.
- 5.25. List of RMU's ten largest electric customers for 2006, 2007, 2008, 2009 and currently. Include each customer's annual total for purchased energy and demand, along with their yearly dollar total of billing.
- 5.26 Does RMU believe that once Rolla owns circuits 71-73 that there will be fewer outages due to storms, shorter duration of customer outages and less basis operation and maintenance. Explain.
- 5.27 Under what legal authority does RMU make contracts that include payment for services not yet delivered to Rolla? (i.e., the 90% Adder in the 2010 AmerenUE CCA)
- 5.28 Under what legal authority does RMU pay for construction of facilities to be owned by a private corporation? (i.e., the 138kV AmerenUE tapping station and lines)
- 5.29 Under what legal authority does RMU pay for a private corporation's taxes? (i.e., the 30% tax gross up in the 2010 AmerenUE CCA)
- 5.30 Under what legal authority does a RMU employee sign contract or authorize City or RMU funds transfers?
- 5.31 Besides the Apr. 20, 2006 letter from Ameren (pg 4-4 of the Study) have there been any discussions with AmerenUE since 2006 indicating why or even if, AmerenUE would "insist on removal of purchased 35kV lines from their 138kV right of ways"?

If so, please provide the date of communication, participants and summary of discussion or provide a copy of any documents.

5.32 Explain the nature of any disadvantage that RMU would incur by reconductoring 3.5 miles of 35kV subtransmission lines with 795 AAC wire (pg 4-4 of the Study).

5.33 Explain the approximately \$4 million first year cost shown in both charts on pg 4-7 of the Study.

5.34 Throughout the Study, RMU was projected to purchase the Phelps substation. Why did the plan change to St. James purchasing the Phelps substation.

5.35 Explain or have RW Beck provide the cost basis for the AmerenUE Annual Facilities Charges that range from \$600,326 to over \$1 million in chart on pg 4-9 of the Study.

5.36 Explain why RW Beck used only the RMU system data from 2006 to 2006. What specific documents or data files were used by RW Beck? Provide copies of this data or authorize RW Beck to provide copies.

5.37 Does St. James have a separate legal services agreement with Brydon, Swearngen and England? If not, how are costs distributed between St. James and RMU?

5.38 Copy of the Request for Qualifications that resulted in the RMU legal services agreement with Brydon, Swearngen and England. Provide copies of all RFQ recipients and respondents.

5.39 Explain briefly how providing a copy of the analysis in Exhibit 4 of the Study could jeopardize RMU system security.

5.40 Explain how providing the RMU delivery point names for distribution substations in Ex 1, pgs 4&5, could endanger the security of RMU's power system.

5.41 Explain why the six blanks on pg 6 of Ex 1 of the Study would jeopardize RMU system security.

5.42 Explain why revealing the column headings (substation names) on pg 7 of Ex.1 could jeopardize RMU system security. On the same page, explain why the blank in the chart footnote could jeopardize RMU system security.

5.43 Explain why revealing the Upline Feeder and Element name information on current system and on a future system analysis for LL10 and LL20 would jeopardize RMU system security.

5.44 In Exhibit 5, several system improvements are planned at LL4, 6, 15 for Alternative 1. If RW Beck performed these Load Level analyses for system deficiencies in order to recommend those improvements, why were these Load Level analysis not provided in the Study?

5.45 Explain how the line item Ameren cost labeled, "Inflated Investment," is calculated in Ex. 5 for Alt.1 at LL6, LL10 and LL15. Provide those calculations.

5.46 Provide a copy of the meeting video recording for the Oct. 19, 2007, RMU board meeting held in City Council chambers that unveiled RMU's chosen system improvement plan from the Study.

5.47 Define the level of increased system capacity that will be provided by construction of Alt. 3D of the Study. Explain the planning assumptions that were used to determine Rolla's need for this level of additional capacity over the next 20 years.

5.48 a. In Exhibit 5 – Present Value Assumptions – on pg 2, provide the formula for calculation of the Capital Recovery Factor for all three columns.

b. Explain how RMU or RW Beck calculated the Percent O&M Expense of Installed Plant for each column.

c. What financial benchmark was used to assess the 2.4% annual inflation of O&M expenses?

5.49 For Alt. 3D, Present Value Analysis in Ex. 5 for LL1, explain the calculation or rationale for

a. the Inflated Investment line item

b. the Capital Recovery line item.

c. the Operating Expenses line item.

5.50 Provide calculations for LL20 subtransmission losses for Alt.1 and Alt. 3D in Ex. 5 of the Study.

5.51 Provide a copy of the projected RMU power system needs report for wholesale power and transmission (not the exact title) sent to MJMEUC/MoPEP for 2005 through 2010. It is used by MJMEUC/MoPEP for planning or estimating future services to RMU.

5.52 What are the potential risks and benefits (financial or operating) to the RMU power system with the dual bulk substation?

5.53 Provide a copy of the last RMU electric rate study.

5.54 How many customer complaints about electric reliability did RMU receive in 2006 through 2010? Provide each date of complaint, customer name, issue and resolution.

5.55 In the RMU Motion to Deny Application to Intervene of Hawley, pg 2, para 3:

- a. List the project of RMU that were included in the "millions of dollars."
- b. Explain your definition of "public interest" and all legal authorities you have relevant to the use of "public interest."
- c. Explain your understanding of "at arm's length" in contract negotiations on page 8, para 9.
- d. List all instances of "previous public notice" stated in paragraph 10.
- e. Provide copies of all Rolla or St. James public input stated in paragraph 10.

5.56 Copy of all payments and itemized bills made by RMU to AmerenUE for the construction of the two 138 kV tapping station and lines in 2010.

5.57 Explain why purchasing and installing both Phelps substation transformers is necessary for Rolla and not duplication of infrastructure currently used to provide Rolla electricity to RMU customers.

