

Cases in which I have filed testimony:

- **TO-2003-0531**, *In the Matter of the Application of Missouri RSA No. 7 Limited Partnership, d/b/a Mid-Missouri Cellular, for Designation as a Telecommunications Company Carrier Eligible for Federal Universal Service Support Pursuant to Section 254 of the Telecommunications Act of 1996*
- **TO-2005-0384**, *Application of USCOC of Greater Missouri, LLC For Designation As An Eligible Telecommunications Carrier Pursuant To The Telecommunications Act Of 1996*
- **TO-2004-0527**, *In the Matter of the Application of WWC License, LLC, d/b/a CellularOne(R), for Designation as an Eligible Telecommunications Carrier, and Petition for Redefinition of Rural Telephone Company Service Areas*
- **TO-2005-0325**, *In the Matter of the Third Application of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular for Designation as a Telecommunications Company Carrier Eligible for Federal Universal Service Support pursuant to § 254 of the Telecommunications Act of 1996*
- **TO-2006-0172**, *In the Matter of the Application of Missouri RSA No. 5 Partnership for Designation as a Telecommunications Company Carrier Eligible for Federal Universal Service Support Pursuant to § 254 of the Telecommunications Act of 1996*
- **TO-2005-0466**, *In the Matter of the Application of Northwest Missouri Cellular Limited Partnership for Designation as a Telecommunications Company Carrier Eligible for Federal Universal Service Support Pursuant to § 254 of the Telecommunications Act of 1996*
- **IO-2003-0281** *In the Matter of the Investigation of the State of Competition in the Exchanges of Sprint Missouri, Inc.*
- **TO-2005-0035**, *In the Matter of the Second Investigation into the State of Competition in the Exchanges of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri*
- **IO-2006-0316**, *In the Matter of CenturyTel of Missouri, LLC's Request for Competitive Classification Pursuant to Section 392.245.5, RSMo. (2005)*
- **IO-2006-0317**, *In the Matter of Spectra Communications Group, LLC d/b/a CenturyTel's Request for Competitive Classification Pursuant to Section 392.245.5, RSMo. (2005)*
- **TO-2005-0423**, *In the Matter of the Application of Chariton Valley Telecom Corporation for Designation as a Telecommunications Carrier Eligible for Federal Universal Service Support Pursuant to 254 of the Telecommunications Act of 1996*
- **TT-2006-0474**, *In the Matter of McLeodUSA Telecommunications Services, Inc. 's Tariff Filing to Increase its Missouri Intrastate Access Rates*
- **TO-2007-0301**, *In The Matter of Embarq Missouri, Inc. Application for Competitive Classification Under Section 392.245.5 RSMo. (2005)*
- **ER-2009-0089**, *In the Matter of the Application of Kansas City Power and Light Company for Approval to Make Certain Changes in its Charges for Electric Service To Continue the Implementation of Its Regulatory Plan.*

Staff Reports for Integrated Resource Plan Filings

- **EO-2007-0409**, *In the Matter of Union Electric Company d/b/a AmerenUE's 2008 Utility Resource Filing pursuant to 4 CSR 240 – Chapter 22*
- **EE-2008-0034**, *In the Matter of the 2008 Resource Plan of Kansas City Power & Light Company Pursuant to 4 CSR 240-22*
- **EE-2009-0237**, *In the Matter of the 2009 Resource Plan of KCP&L Greater Missouri Operations Company Pursuant to 4 CSR 240-22*

Ameren Missouri
Response to MPSC Data Request
MPSC Case No. EO-2011-0128
In the Matter of the Application of Union Electric Company for Authority To
Continue the Transfer of Functional Control of Its Transmission System to the
Midwest Independent Transmission System Operator, Inc.

Data Request No.: MPSC 0013 – Steve Dottheim

(1) What is the estimated cost and/or benefit impact of the MISO Resource Adequacy Construct filed in FERC Docket ER11-4081 on the cost-benefit analysis presented in Arora Direct Testimony, Schedule AA-1? If Ameren Missouri has performed this analysis, please provide a copy and workpapers. If Ameren Missouri has not performed this analysis, does Ameren Missouri intend to perform this analysis? If yes, when?

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 29, 2011

Ameren Missouri has not performed the requested analysis. However, Ameren Missouri does not believe that the MISO Resource Adequacy Construct (RAC) as filed with the FERC would materially affect the net benefit reflected in the cost-benefit analysis included with my direct testimony as it is expected to not impact energy prices, and there is no indication that the price for capacity will be materially changed by the RAC. Moreover, because the cost-benefit analysis has assumed MISO participation causes a loss of incremental capacity sales, any increase in capacity prices arising from the new construct would only serve to further increase the net benefit of staying within the MISO as Ameren Missouri is long capacity.

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Data Request No.: MPSC 0019 – Steve Dottheim

On Page 5, Line 1, Mr. Arora discusses Administrative Charge Savings, and at Line 4 he says, “also assuming the planned entry into the MISO of Entergy in 2014.” What other areas, if any, of the cost-benefit study in Arora Direct Testimony Schedule AA-1 were adjusted to take into account the “planned entry into the MISO of Entergy in 2014?”

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 19, 2011

None.

Ameren Missouri
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Data Request No.: MPSC 0024 – Steve Dottheim

Were any off-system sales, or capacity sales, to Entergy modeled in the updated 2012-2014 cost-benefit study? If yes, please describe the assumptions used for the addition of Entergy.

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 29, 2011

No.

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Data Request No.: MPSC 0027 – Steve Dottheim

If Entergy does not become a member of MISO during the study period, what adjustments will need to be made to the updated cost-benefit study in Arora Direct Schedule AA-1 to reflect this event?

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 29, 2011

The Administrative Fee savings in 2014 would be increased by approximately \$1 million - thus decreasing the NPV benefit of remaining in MISO by approximately \$700,000.

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Data Request No.: MPSC 0029 – Steve Dottheim

Please explain why SPP implementing a Day 2 market, as mentioned on Page 12, Line 13 of Mr. Arora’s Direct Testimony, is considered a “material uncertainty,” while Entergy’s planned entry into MISO is considered a “certainty”? Please include a description of the methodology used to determine whether something is “material uncertain,” “uncertain,” or “certain” in this portion of Mr. Arora’s Direct Testimony.

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 29, 2011

Ameren Missouri has not claimed that Entergy’s planned entry into MISO is a “certainty” – a word which should be noted does not even appear in my direct testimony. In fact, this testimony includes the response “It does”, when the question is asked if this uncertainty remains.

Ameren Missouri’s reduction of the projected savings in administrative fees is not an indication of the certainty that Entergy will join MISO.

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Data Request No.: MPSC 0007 – Steve Dottheim

Question 1 Please explain the analysis process that would be gone through for projects to be categorized or distinguished as: A) “for purposes of maintaining reliable service to Ameren Missouri’s customers,” rather than or from, B) Multi-Value Projects, Regionally Beneficial Projects, or projects designed to interconnect and integrate new generation resources. Question 2 What considerations would be taken into account? Question 3 Describe the analysis process that would be gone through in terms of deciding whether Ameren Missouri or ATX would build: A) a RECB I Project; B) a RECB II project; C) an MVP project. Question 4 What entity would go through the particular analysis process: A) Ameren Missouri, B) Ameren Corp., C) ATX, or D) would it be a collaboration of these or other entities? Question 5 Would any of the Ameren Corp. affiliates file or make the Commission/Staff aware of the analysis process or decision result?

RESPONSE

Prepared By: Maureen Borkowski
Title: Sr. VP Ameren Services Co.
Date: August 1, 2011

Subject to the Company’s objections:

With respect to the first and second questions, MISO conducts the analysis process. See the MISO tariff and the MISO Transmission Expansion Plan process documents issued by MISO;

With respect to the third and fourth questions, Ameren Missouri has already made the decision that it will only build transmission projects needed to maintain reliable service to its load as well as building transmission facilities needed to connect Ameren Missouri generation to the transmission grid. This decision was made in recognition of the fact that Ameren Missouri has limited capital to invest in its generation and energy delivery operations, and that it must focus those investments on those needed to maintain reliable service rather than on regional transmission projects.

With respect to the fifth question, Ameren Missouri has already informed the Commissioners and Staff of the process. (See the response to the third and fourth questions above.) Ameren Missouri is willing to inform the Commission as to which transmission projects will be constructed by an entity other than Ameren Missouri.

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Data Request No.: MPSC 0002 – Steve Dottheim

In Ameren Missouri's opinion, is ATX required, by the Missouri Commission's Affiliate Transaction Rules, Ameren Corp. policy, or otherwise, to pay Ameren Missouri for the right to build a transmission project in the Ameren Missouri zone of MISO? If ATX is not so required, how is it not so required, and why shouldn't it be? How would Ameren Missouri estimate the value of the right to build a transmission project in the Ameren Missouri service territory?

RESPONSE

Prepared By: Maureen A. Borkowski

Title: Sr. VP Ameren Services Co.

Date: August 1, 2011

With respect to the last question, and subject to the Company's objections, Ameren Missouri does not know if there is any such value and if there were such value, does not know how it would be estimated.

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Data Request No.: MPSC 0004 – Steve Dottheim

Are there any plans for ATX to compensate Ameren Missouri for transmission projects constructed by ATX in the Ameren Missouri zone of MISO? If yes, please identify those plans.

RESPONSE

Prepared By: Maureen A. Borkowski
Title: Sr. VP Ameren Services Co.
Date: August 1, 2011

Subject to the Company's objection, no.

Missouri Public Service Commission**Data Request**

Data Request No. 0006
Company Name Ameren Missouri-Investor(Electric)
Case/Tracking No. EO-2011-0128
Date Requested 7/18/2011
Issue Other - Other
Requested From Mary L Hoyt
Requested By Steve Dottheim
Brief Description Does Affiliate Transaction Rules reach to ATX?

Description Does the Missouri Commission have access to the books and records of ATX pursuant to 4 CSR 240-20.015(6)(A) and (B)? If not, why would 4 CSR 240-20.015, in general, or 4 CSR 240-20.015(6)(A) and (B) in particular, not apply to ATX?
Due Date 8/1/2011

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. EO-2011-0128 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ameren Missouri-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Ameren Missouri-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

Security Public
Rationale NA

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Data Request No.: MPSC 0008 – Steve Dottheim

A. Does Ameren Missouri have a Cost Allocation Manual that explains how transactions between Ameren Missouri and ATX would be structured and booked? B. Is it Ameren Missouri's opinion that the Missouri Affiliate Transaction Rules apply to payments that Ameren Missouri would make pursuant to tariffs which apply to ATX? For example, if ATX constructs a transmission project in MISO and Ameren Missouri pays for part of that project through the MISO tariff, would the Missouri Affiliate Transaction Rules apply to those funds that eventually flow to ATX?

RESPONSE

Prepared By: Maureen A. Borkowski
Title: Sr. VP Ameren Services Co.
Date: August 1, 2011

Subject to the Company's objections:

Subpart A: Yes.

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Data Request No.: MPSC 0012 – Steve Dottheim

Is the cost estimate for a transmission project different depending upon whether Ameren Missouri or ATX is constructing the project? Would cost overruns be treated differently by Ameren Missouri for ratemaking purposes depending upon whether Ameren Missouri or ATX is constructing the transmission project?

RESPONSE

Prepared By: Maureen A. Borkowski
Title: Sr. VP Ameren Services Co.
Date: August 1, 2011

Subject to the Company's objections, Ameren Missouri does not know the answer to this question.

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Data Request No.: MPSC 0014 – Steve Dottheim

If the MISO Resource Adequacy Construct filed in FERC Docket ER11-4081 becomes effective, how many planning years of the 2012-2014 study period would Ameren Missouri be able to “self schedule” or “opt out” of?

RESPONSE

Prepared By: Ajay K. Arora
Title: Director – Corporate Planning
Date: August 29, 2011

Ameren Missouri would be able to either self-schedule or opt out of all of the years.

From: Carl Monroe [cmonroe@spp.org]
Sent: Wednesday, August 31, 2011 11:13 AM
To: Mckinnie, Adam
Subject: FW: Change in Grain Belt Express Project

FYI, I suspect you know this already.
Carl

From: Wayne Galli [mailto:wgalli@cleanlineenergy.com]
Sent: Wednesday, August 31, 2011 10:56 AM
To: Jody Holland; Katherine Prewitt; Nwilliams@sunflower.net; Lanny Nickell; Myers, Alan; Carl Monroe
Cc: Diana Coggin; Mark Lawlor
Subject: Change in Grain Belt Express Project

Folks –

You've probably gotten word by now after our announcement to the Missouri PSC, but we wanted to let you know of a change in the Grain Belt Express project. Preliminary interconnection studies underway by the Midwest ISO suggest the St. Francois substation and surrounding system in Missouri are not capable of absorbing the full capacity of the Grain Belt Express Clean Line. As a result, Clean Line is exploring the possibility of delivering a portion of the energy to a point in Missouri and the rest to a point farther east (i.e., a multi-terminal configuration).

For the second point of interconnection, Clean Line is considering 765kV substations within PJM. We have submitted an interconnection request for 3500MW at the AEP Sullivan substation. We are encouraged by advances in HVDC technology, which would make this possible, and we believe this configuration will increase the benefits of the Grain Belt Express Clean Line to the entire project footprint.

This, of course, will affect how we move forward with the Criteria 3.5 studies in terms of additional affected parties but the impact on SPP members should not change or will be minimal. We are working on determining new affected parties and bringing them to the table in the discussions.

If you have any questions, please don't hesitate to ask. We will follow-up with an official notification.

Wayne Galli

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