BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a AmerenUE for an Order Authorizing the Sale and Transfer of Certain Assets of AmerenUE to St. James Municipal Utilities and Rolla Municipal Utilities.

Case No. EO-2010-0263

MOTION TO REQUEST DOCUMENT

- I am making this Motion to request a copy of the full engineering report prepared by R.W. Beck for the Rolla Municipal Utilities Power Delivery Master Plan dated October 2007. Without the entire report I am unable to fully prepare a response to RMU's continuing objections to my application to intervene and to their motion for expedited treatment and a prehearing conference.
- 2. I have previously submitted that the RW Beck power system study is no longer valid due to large declines in electricity usage in Rolla since 2007. RMU continued to bid out pieces of the project even though there is a valid question as to whether this project is necessary and prudent. In fact, there was a recent Rolla Daily News article

in which RMU General Manager Rodney Bourne stated that RMU would be well over \$1.7 Million in deficit spending for this year due to payments to AmerenUE for the tapping station that is part of this project even though the entire project was to be paid for with the lease purchase proceeds held in the Cayman Islands. The \$1.5 million annual lease purchase payment (over twenty years) for this project far exceeds the rental payments to AmerenUE for the Phelps substation and associated transmission and distribution overbuild that RMU is pursuing. Therefore, I do believe it is time to revisit the RW Beck engineering study because any failure to demand accurate current data and make system projections based on current data will violate the basic principles of Good Utility Practice.

Respectfully submitted,

Donna D. Hawley 2602 Brook Dr. Rolla, MO 65401 <u>hawleyd@fidnet.com</u> 573-458-2165

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was

sent by electronic mail, on May 17, 2010, to the following:

Kevin Thompson OFFICE OF THE GENERAL COUNSEL Governor Office Building, 8th Floor Jefferson City, Mo 65101 Jefferson City, MO 65101 <u>Kevin.thompson@psc.mo.gov</u>

Lewis Mills OFFICE OF THE PUBLIC COUNSEL Governor Office Building, 6th Floor <u>lewis.mills@ded.mo.gov</u>

Steven R. Sullivan Thomas M. Byrne AMEREN SERVICES COMPANY St. Louis, MO <u>lowery@smithlewis.com</u> <u>ssullivan@ameren.com</u> James B. Lowery SMITH LEWIS LLP Columbia, MO <u>tbyrne@ameren.com</u>

Gary W. Duffy MBE #24905 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 duffy@brydonlaw.com Attorneys for The City of Rolla, Missouri

The City of St. James, Missouri

Respectfully submitted,

Donna D. Hawley

TheRollaDailyNews.com

'Cautious' budget plan

Tapping station expected to be major expense

By Adam Van Hart The Rolla Daily News Posted Jun 24, 2010 @ 02:57 PM

Rolla, Mo. — In its preliminary budget, Rolla Municipal Utilities is taking a cautious approach to next year's finances.

With three months left in RMU's fiscal year, it's not too late for the utility's officials to start thinking about next year, and the projected \$28.5 million budget.

"We are projecting out where we will be 18 months into the future, so it is a little bit of a crystal ball," RMU General Manager Rodney Bourne said Wednesday.

What is in the crystal ball is a net loss for 2010 of about \$1.7 million, because of work being done by Ameren UE on a tapping station for RMU.

Without that expense, RMU would be in the black by \$300,000 according to Bourne. But the cautious estimating isn't stopped at the overall profit.

In the individual departments, only water production is projected to increase in operating margins beyond what is expected to be 2010's final numbers.

RMU, however, is still expecting to collect \$578,335 in cash at the end of fiscal year 2011. That is better than what was expected to have been collected this year if the tapping station work was not being done.

Looking into next year, the preliminary budget does not have in it any plans to raise rates beyond what has already been discussed, including the water service availability fee increasing by \$1. Bourne added that RMU's expenses have been steady as of late.

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