

## FAC MINIMUM FILING REQUIREMENTS<sup>1</sup>

(A) An example of the notice to be provided to customers as required by 4 CSR 240-20.090(2)(D);

### LOCAL PUBLIC HEARING NOTICE

AmerenUE has filed tariff sheets with the Missouri Public Service Commission (PSC) that would increase the company's electric service revenues by approximately \$402.5 million. Included in this amount is an increase in the level of net fuel costs that are recovered in base rates of approximately \$227 million, which will have the effect of making the company's fuel adjustment clause charges lower in the future than they otherwise would have been. The request would raise a typical residential customer's bill by approximately 18%, translating to just more than an approximately \$14 monthly increase, or less than fifty cents per day. The permanent rate increase request, which is subject to regulatory approval, would take effect no later than the early summer of 2010. [A portion of the rate increase was implemented by the Commission on an interim, subject to refund basis on October 1, 2009.] AmerenUE's rate filing also includes a request to continue its fuel adjustment clause in substantially its current form which would continue to allow 95% of increases or decreases in net fuel costs to be passed through to customers as a separate line item on customer's bills.

AmerenUE's filing also includes a request to implement an environmental cost recovery mechanism. An environmental cost recovery mechanism, if approved by the Commission, would allow net increases or decreases in governmentally-mandated environmental costs to be passed through to customers as a separate line item on customers' bills (either through a separate charge in the case of an increase or through a billing credit in the case of a decrease).

Public comment hearings have been set before the PSC as follows:

[To be determined by the Commission]

If you are unable to attend a live public hearing and wish to make written comments or secure additional information, you may contact the Office of the Public Counsel, P.O. Box 2230, Jefferson City, Missouri 65102, telephone (573) 751-4857, email [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) or the Missouri Public Service Commission, Post Office Box 360 Jefferson City, Missouri 65102, telephone 800-392-4211, email [pscinfo@psc.mo.gov](mailto:pscinfo@psc.mo.gov). The Commission will also conduct an evidentiary hearing at its offices in Jefferson City during the weeks of \_\_\_\_\_ through \_\_\_\_\_, beginning at \_\_\_\_\_ a.m. The hearings and local public hearings will be held in buildings that meet accessibility standards required by the Americans with Disabilities Act.

If a customer needs additional accommodations to participate in these hearings, please call the Public Service Commission's Hotline at 1-800-392-4211 (voice) or Relay Missouri at 711 prior to the hearing.

(B) An example customer bill showing how the proposed RAM shall be separately identified on affected customers' bills in accordance with 4 CSR 240-20.090(8);

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<sup>1</sup> Each item (A) .... (T) corresponds to the subparagraphs in 4 CSR 240-3.161(3).

Attached hereto as Attachments A and B are two different examples of customer bills (one in the postcard format used by AmerenUE for residential customers and one in the billing format used by AmerenUE for non-residential customers), as required by 4 CSR 240-20.091(8).

(C) Proposed RAM rate schedules;

Attached to the testimony to which this Schedule is attached as Schedule LMB-E3 is Rider FAC - Fuel and Purchased Power Adjustment Clause, which is the proposed rate schedule for the fuel adjustment clause proposed by AmerenUE, and which shows minor changes to the existing Rider FAC as outlined in the testimony.

(D) A general description of the design and intended operation of the proposed RAM;

As discussed in the testimony to which this Schedule is attached, AmerenUE is proposing to continue its existing Fuel and Purchased Power Adjustment Clause ("FAC") in substantially its current form. The FAC applies to all rate classes, and would reflect increases or decreases in fuel, transportation and purchased power costs, including transportation, net of off-system sales revenues ("net fuel costs"), according to the formula expressed in the rate schedule referred to in item (C) above. Historic fuel, transportation and purchased power costs, including transportation, net of off-system sales revenues, would be accumulated during three different Accumulation Periods, as designated in the rate schedule, and then 95% of the change in fuel costs would be recovered (if an increase) or credited (if a decrease) using the calculated FPA (as defined in the rate schedule) over three different Recovery Periods (also designated in the rate schedule), each of which cover a period of 12 months. Two of the three changes to the FPA rate would coincide with the existing seasonal changes in AmerenUE's base rates. The tariff includes two seasonal base amounts, known as the "net base fuel costs" (factor NBFC in the tariff), against which changes in net fuel costs are tracked. The FPA would be applied to customer bills on a per kilowatt-hour ("kWh") basis, as adjusted for voltage level (to take into account varying line losses at different service voltage levels).

The FPA formula includes a factor to accommodate adjustments made as a result of the true-up process or any prudence disallowances occurring as a result of prudence reviews; a factor to accommodate a reduction in fuel costs to account for the value of the Taum Sauk Plant (factor "TS" in the tariff); and a factor to account for an agreement from AmerenUE's last rate case regarding off-system sales (factor "S" in the tariff).

(E) A complete explanation of how the proposed RAM is reasonably designed to provide the electric utility a sufficient opportunity to earn a fair return on equity;

AmerenUE's continued FAC tariff, which is substantially the same as its existing FAC, continues to be reasonably designed to provide AmerenUE with a sufficient opportunity to earn a fair return on equity for several reasons. First, it provides for full and timely recovery of 95% of the changes in AmerenUE's fuel, transportation, and

purchased power costs, including transportation, net of off-system sales revenues, by reflecting increases and decreases in such costs in rates. The 5% of changes not passed through the FAC provide the Company with additional incentives to manage fuel and purchased power costs, but still provide recovery of 95% of those costs. Full and timely recovery of 95% of those costs is based upon the assumption that an appropriate level of costs for fuel and purchased power, including transportation, net of off-system sales, will be set in base rates based upon these costs in the test year, as updated and trued-up in the rate case, and it also assumes appropriate base rate recovery of other cost of service items. With the FAC, it is more likely that fuel and purchased power costs, which are often times much more significant, volatile, uncertain and much more difficult to control than other utility costs, will be timely and fairly reflected in the rates charged to customers. Examples of factors that can often make these very large but critical costs highly volatile, uncertain and beyond the utility's control include the fact that fuel and purchased power is purchased on national markets which are subject to increasing volatility due to global demand, increased trading activities, world events, financial crises, weather (e.g. hurricanes), abnormally hot or cold weather, or other factors. Second, the FAC assists in addressing the relentlessly increasing, volatile and uncertain fuel costs incurred by the Company in providing service to its customers. Third, a continuation of the FAC continues to keep AmerenUE on comparable footing with utilities operating in other states, more than 95% of which use similar rate adjustment mechanisms. Moreover, it will keep AmerenUE on equal footing with the overwhelming majority (36 out of 37) of utilities operating in other non-restructured Midwestern states, including the heavily coal-based utilities (26 out of 27) in these other states. Fourth, the FAC continues to be reasonably designed to provide AmerenUE with a sufficient opportunity to earn a fair return on equity because it mitigates the very significant regulatory lag which is prevalent when dealing with such large, uncertain and often volatile costs, by preventing deterioration in the utility's financial position (including relative credit standing, which is a key determinant of borrowing costs), particularly in the fact of known fuel cost increases facing AmerenUE, and by ensuring recovery of actual net fuel costs, which may vary substantially from expected levels.

(F) A complete explanation of how the proposed FAC shall be trued-up to reflect over- or under-collections, or the refundable portion of the proposed IEC shall be trued-up, on at least an annual basis;

The FAC will be trued-up on the first filing date for an adjustment to the FPA rate that occurs at least two months after the end of each 12-month recovery period. Any true-up adjustments will include interest, as provided for in the FAC tariff.

True-up amounts will reflect the difference between net fuel costs authorized for recovery under the FAC for the subject recovery period and net fuel costs actually collected. Actual collections can vary from those expected based upon actual net fuel costs because of variations in the actual kWh sales during a given recovery period versus the estimated kWh sales used to set the FAC rate in effect during a given recovery period.

(G) A complete description of how the proposed RAM is compatible with the requirement for prudence reviews;

AmerenUE's FAC is compatible with the requirement for prudence reviews for several reasons. AmerenUE's FAC is based on actual fuel and purchased power costs, including transportation, net of actual off-system sales revenues, which simplifies the prudence review. The fuel and purchased power costs included in the FAC are well defined in Rider FAC (the FAC tariff), including specific references to the FERC accounts in which the costs are recorded. Moreover, 4 CSR 240-3.161(5), requires the filing monthly of all the supporting data for the fuel and purchased power costs, revenues, plant generation and related information, all of which can be used as part of the prudence review process. These reports are currently being filed by AmerenUE on a monthly basis. This includes providing monthly fuel burn and generating statistics for each of the generating plants. In addition, 4 CSR 240-3.190 requires submission to the Commission Staff each month of information on system output, hourly generation, purchases and sales, planned outages, forced outages and capacity purchases. All contracts for fuel, transportation and purchased power will also be available for review in connection with the prudence review process. The prudence review could also be used in conjunction with an audit plan, through which appropriate financial data can be sampled from the fuel and fuel transportation invoices that will be available.

(H) A complete explanation of all the costs that shall be considered for recovery under the proposed RAM and the specific account used for each cost item on the electric utility's books and records;

These costs are generally described as follows:

**Coal Commodity Costs.** This will include costs associated with purchase of coal, as well as british thermal unit ("btu") content adjustments and sulfur content quality adjustments associated with coal contracts. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the coal inventory account and allocation of dollars to each plant through the coal pooling mechanism will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

**Coal Transportation Costs.** This will include costs associated with transportation of coal, as well as fuel adjustments (e.g., diesel surcharges) associated with transportation contracts and price hedging mechanisms. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as coal is used. A detailed accounting of all additions and adjustments to the coal inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period. Railcar costs are included in this account, and a separate accounting of all railcar costs flowing through inventory will be maintained as well as the allocation of costs to plant inventory accounts.

**Oil Costs.** This will include costs associated with oil and any price hedging mechanisms. These costs are accumulated in an inventory account, and expensed on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the oil inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

**Natural Gas Costs.** This will include costs associated with the gas commodity, storage, reservation, transportation, hedging costs and oil costs associated with gas-fired plants. A detailed accounting of all additions and adjustments to inventory will be included in a reconciliation, including the calculation of fuel expenses recorded during the accounting period. Also included will be details of all direct costs to expense.

**Water for Power.** This will include costs associated with water used for hydraulic power generation. Details of water purchased for power will be included in a reconciliation.

**Nuclear Fuel Costs.** This will include costs associated with nuclear fuel. These costs are accumulated in inventory accounts under FERC Account 120, and amortized on a weighted average cost basis as used. A detailed accounting of all additions and adjustments to the inventory account will be included in a reconciliation, as well as the calculation of the fuel expense recorded during the accounting period.

**Cost of Purchased Power.** This will include the cost at the point of receipt by the Company of electricity purchased for resale. It shall include, also, net settlements for exchange of electricity or power, such as economy energy, off-peak energy for on-peak energy, spinning reserve capacity, etc. In addition, this category will include costs incurred from regional transmission organizations (“RTOs”) for Revenue Sufficiency Guarantee, Losses, deviation charges, revenue neutrality and inadvertent charges, but shall exclude MISO administrative costs arising under MISO Schedules 10, 16, 17 and 24, and shall exclude capacity charges under contracts with a term in excess of one (1) year.

The following table summarizes this information by account:

Type of Cost	Inventory Major	Expense Major	Description
Coal Commodity	151	501	Cost of coal delivered at the mine
Applicable Taxes	151	501/547/518	Applicable taxes on fuel and transportation costs
Btu adjustments	151	501	Added/subtracted amounts to coal contracts for btu content of coal
Coal Quality (sulfur) adjustments	151	501	Added/subtracted amounts to coal contracts for sulfur content of coal
SO <sub>2</sub> Hedge costs/revenues	151	501	Costs/Revenues associated with price hedges related to coal contract SO <sub>2</sub> adjustments

Railroad, truck and barge transportation	151	501	Costs associated with delivering coal from mine to plant
Switching & Demurrage	151	501	Costs associated with switching and demurrage costs incurred in delivering coal from the mine to the plant
Railcar repair	151	501	All railcar costs will be aggregated in a separate minor account under major Account No. 151. As part of the monthly closing process, these costs will be allocated to transportation inventory at the plants based on tonnage delivered during the period.
Railcar depreciation	151	501	
Railcar leases	151	501	
Railcar inspection	151	501	
Heating Oil Hedge costs/revenues	151	501	Costs/revenues associated with price hedges related to diesel fuel adjustments in coal transportation contracts
Hedge costs associated with coal	151	501	Costs/revenues associated with price swaps, options, or other derivatives to manage fuel costs
Commissions and fees	151	501	Broker costs and commissions associated with hedging activities of coal commodity and transportation
Oil	151	501/547	Costs associated with oil used at plants for generation
Nuclear Fuel	120	518	Costs associated with nuclear fuel, including provisions for transportation, storage and disposal of nuclear fuel including spent fuel disposal fees, and handling costs for nuclear fuel assemblies.
Water for Power	Expensed	536	Costs associated with water used for hydraulic power generation
Fuel costs	151/direct expense	547	Delivered cost of gas, oil, propane, and other fuels used in other power generation
Ash Disposal Costs	Direct Expense	501	Cost to dispose of ash, net of ash revenues
Other Portfolio optimization activities	151	501/547	Revenues and expenses related to selling excess coal or natural gas and other portfolio optimization activities
Purchased Power Costs		555, 565, and 575	Cost of purchased power, but excluding MISO administrative costs under MISO Schedules 10, 16, 17 and 24, and excluding capacity charges under contracts with a term in excess of one (1) year, incurred to support sales to all Missouri retail customers and off-system sales allocated to Missouri retail operations. Also included are replacement power insurance premiums (other than relating to the Taum

			Sauk Plant) to the extent those premiums are not reflected in base rates. Change in replacement power insurance premiums (other than those relating to the Taum Sauk Plant) from the level reflected in base rates shall increase or decrease purchased power costs. Notwithstanding the foregoing, concurrently with the date the “TS” factor is eliminated, premiums relating to replacement power insurance for the Taum Sauk Plant shall also be included in purchased power expense. See Item (I) below relating to the treatment of replacement power insurance recoveries
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(I) A complete explanation of all the revenues that shall be considered in the determination of the amount eligible for recovery under the proposed RAM and the specific account where each such revenue item is recorded on the electric utility’s books and records;

Description	Major	Comments
Off-System Sales	447	All sales transactions (excluding retail sales or long-term full or partial requirements sales to non-jurisdictional customers) that are associated with (1) AmerenUE Missouri jurisdictional generating units and (2) power purchases made to serve Missouri retail customers, including any associated transmission.
Coal Sales	151	Fuel costs reduced by revenues from coal sales
Coal and Transportation Fuel Hedges	151	Revenues associated with price swaps and other hedges related to coal contracts and Fuel for Transportation adjustments
Coal and Transportation Fuel Hedges	151	Revenues associated with price swaps and other hedges related to coal contracts, and Fuel for Transportation adjustments upon settlement.
Railcar leases	151	Transportation costs reduced by revenue from lease of company owned/leased railcars to other companies
Gas Sales	151/547	Revenues and expenses associated with hedging activities and gas portfolio optimization
Ash Sales	501	Sales of fly ash and other types of ash produced at plants
Replacement Power Insurance Recoveries	555	Expected replacement power insurance recoveries (other than those relating to the Taum Sauk Plant) qualifying as assets under Generally Accepted Accounting Principles. Notwithstanding the foregoing, concurrently with the date the “TS” factor is eliminated, expected replacement power insurance recoveries relating to the Taum Sauk Plant that qualify as assets under Generally Accepted Accounting Principles will also be included.

(J) A complete explanation of any incentive features designed in the proposed RAM and the expected benefit and cost each feature is intended to produce for the electric utility's shareholders and customers;

AmerenUE's FAC contains the same FAC-specific incentive feature the Commission included in its existing FAC, and that has also been included in the FACs approved for Aquila, Inc. in Case No. ER-2007-0004, for The Empire District Electric Company in Case No. ER-2008-0093, and that is contained in the continued FAC for Kansas City Power & Light Company – Greater Missouri Operations (formerly Aquila) in Case No. ER-2009-0090. The FAC is symmetrical. That is, 95% of increases or decreases are passed through the FAC. Given that it is expected that AmerenUE's fuel costs will continue to increase for the foreseeable future, by only passing through 95% of the changes in fuel costs, it is highly likely that customers will benefit by not bearing 5% of those increases. If fuel costs were to decrease (because of, for example, higher off-system sales revenues), customers would receive 95% of the decrease. If off-system sales were outside the FAC, customers would not benefit from those higher off-system sales. Customers also benefit because of the additional incentive to mitigate fuel cost increases created by the fact that the Company will simply not recover 5% of the increase in fuel costs.

(K) A complete explanation of any rate volatility mitigation features designed in the proposed RAM;

AmerenUE's proposed FAC spreads the recovery of the difference between the base fuel costs set in the rate proceeding and fuel costs during each Accumulation Period over a full 12-month period. This has a mitigating effect on rate increases or decreases that will occur as a result of the three periodic FAC adjustments each year. Moreover, as discussed in Item (L) below, AmerenUE utilizes a hedging strategy designed to mitigate fuel cost volatility. Moreover, the FAC is seasonally adjusted and contains seasonally differentiated net base fuel costs. This results in tracking higher actual fuel costs against higher base fuel costs (in the Summer) and lower actual fuel costs against lower base fuel costs (in the Winter), both of which tends to mitigate volatility.

(L) A complete explanation of any feature designed into the proposed RAM or any existing electric utility policy, procedure, or practice that can be relied upon to ensure that only prudent costs shall be eligible for recovery under the proposed RAM;

In addition to keeping books and records relating to fuel, transportation and purchased power in accordance with Generally Accepted Accounting Principles and the Uniform System of Accounts, AmerenUE employs a number of policies, procedures and practices, including the use of internal audits where appropriate, to ensure the prudence of such costs. Described below are relevant policies, procedures and practices.



## Fuel Accounting

In order to ensure proper accounting for coal, gas, and nuclear fuel costs, the following procedures and practices are in place.

**Coal.** A trainbook is maintained by the coal supply and fuel accounting group. This database maintains information relating to all contracts, and deliveries scheduled and received against each contract. Fuel accounting enters invoice information into a database, and ensures that all coal paid for was contracted for, received by the plant, and that the invoice amount agrees with the contracted amount. This trainbook also calculates quality standards, and btu and sulfur adjustments are accrued for based on receipts and true-up with actual invoices. This database is a critical tool in the month-end accrual process, to ensure that all coal commodity, transportation, and quality adjustment costs have been accrued in the proper period. All inventory, receivable, and payable accounts associated with coal are balanced on at least a quarterly basis.

**Gas.** Gas supply executives prepare a month-end estimated gas cost worksheet for AmerenUE's generating units. Current month estimates, plus a true-up of prior month actuals versus estimates, are recorded in the current month. All inventory, receivable, and payable accounts associated with gas are balanced on at least a quarterly basis.

**Nuclear Fuel.** Nuclear fuel expenses and month end balances are calculated in the nuclear fuel accounting system called Surf'n, which is maintained by the nuclear fuel procurement group. All accounts charged in the general ledger are balanced with the nuclear fuel system on at least a quarterly basis.

## Fuel Procurement

**Fossil (e.g., coal and natural gas):** To ensure fuel purchases are prudent, the fuel acquisition for AmerenUE's generation is governed by the AmerenEnergy Fuels and Services Company (AFS) Risk Management Policy. The rules and guidelines within the Policy, which were approved by Ameren's Risk Management Steering Committee, identify the levels of coal and natural gas for generation that must be acquired and hedged for future periods, identifies the various types of allowable commodity transactions, and creates extensive management reporting to monitor all commodity transactions and price positions. The Policy provides that coal and natural gas be purchased using a risk management strategy that secures the required volume for future periods within maximum and minimum policy limits while reducing exposure to market volatility. The volumetric risk (securing the necessary quantities of fuel needed for electricity production) and price risk (entering into financial and physical transactions to hedge against price spikes and volatility in the market) for generation fuels are controlled through compliance with the Policy procurement limits. These limits create maximum and minimum levels of volumetric and price hedging for up to six years into the future to ensure disciplined acquisition of fuel and

to diversify price risk over time. Purchasing fuel under these procurement limits provides several benefits, including avoiding the need to purchase large quantities of fuel during periods of price spikes, and ensuring that sufficient quantities are purchased in advance of actual need to minimize any physical shortage that might occur in the fuel markets. These limits do not necessarily result in the lowest possible price for fuel, but strike a balance between price stability and security of supply. In addition to the Risk Management Policy, there are annual fuel supply planning processes which determine the actual acquisition of fuel for generation needs from various production basins and other parameters of fuel supply including transportation, inventory levels, management of inventory levels through purchases and sales, and logistics with power plants/power traders/generation dispatchers. These processes also encompass the development of competitive or alternative transportation methods between transportation providers to ensure competitive and reliable fuel supply. To ensure competitive fuel supply in the commodity markets, the fuel is procured and hedged through several diverse methods including periodic competitive bids, negotiated purchases, electronic trading, Over-the-Counter (OTC) transactions, futures market transactions, and spot market transactions. In addition to the Risk Management Policy and fuel planning processes, the Internal Audit Department conducts routine audits of fuel supply on a three year cycle for purposes of reporting to senior executives and the Board of Directors. Fuel for generation is purchased by AFS, which is staffed with full-time fuel professionals to manage all aspects of fuel supply and operations with a mission of delivering reliable and competitive fuel supply for all Ameren affiliated companies, including AmerenUE.

**Nuclear:** To ensure nuclear fuel purchases are prudent, AmerenUE follows a number of corporate procurement practices (as outlined below), including a specific Nuclear Fuel Risk Management Policy approved by the Ameren Risk Management Steering Committee, and a Nuclear Procedure for Nuclear Fuel Contracts. These practices and policies provide very similar controls to those described above relating to procurement of fossil fuels. The foregoing practices, policies and procedures are designed to: i) ensure a reliable supply of nuclear fuel to the Callaway Plant, ii) effectively manage nuclear fuel costs, iii) reduce AmerenUE's exposure to nuclear fuel price volatility, iv) mitigate risks related to nuclear fuel, and v) provide highly reliable nuclear fuel to the Callaway Plant. Nuclear fuel is procured using several processes. AmerenUE utilizes long-term contracts to ensure nuclear fuel is available for Callaway requirements. In addition, inventories of nuclear fuel are maintained to enhance security of supply. AmerenUE also continually monitors market assessments of nuclear fuel supply and demand, price forecasts, and projections of Callaway fuel requirements. This monitoring is an integral part in the continued review of procurement plans. Price and non-price elements, such as reliability of supply, supplier diversity, quality and quantity must also be balanced. In appropriate instances, nuclear fuel procurements are also made through competitive bidding, with all qualified suppliers solicited (however, depending upon the need, in some instances only 2-3 suppliers may be available). Moreover, while the nuclear fuel supply market is worldwide, other than the uranium supply component itself, there are limited suppliers for the other components of the nuclear fuel cycle. With the excellent

operating performance of existing plants, and the announced plans for new units, supplies of nuclear fuel have also tightened.

Nuclear fuel procurement is also under the direction and control of a full-time professional in nuclear fuel procurement to manage all aspects of nuclear fuel supply and operations.

(M) A complete explanation of the specific customer class rate design used to design the proposed RAM base amount in permanent rates and any subsequent rate adjustments during the term of the proposed RAM;

The FAC applies the FPA to all of AmerenUE's Missouri electric retail customers (*see* Schedule No. 5 - Schedule of Rates for Electric Service customers). To the extent fuel and purchased power costs are included in base rates the rate design discussed in the direct testimony of AmerenUE witness Wilbon C. Cooper is also applied. With regard to the proposed RAM amount in base rates, a level of 1.102 cents per kilowatt-hour at the generation level is included in Rider FAC for the Summer and 1.494 cents per kilowatt-hour for the Winter, as filed. Adjustments to the rates for each class will be performed in accordance with the formula reflected in Rider FAC and will be reflective of changes in the factors included in the formula versus the values used to determine the RAM amount in base rates. The adjustments reflect a calculation of the FPA based on test year costs and sales consistent with the factors included in the FPA formula in Rider FAC. Actual customer FPA adjustments will be applied to all retail billings for electric service on a per kilowatt-hour basis, as adjusted for losses based on the customers' service voltage (secondary, primary, large transmission service).

(N) A complete explanation of any change in business risk to the electric utility resulting from implementation of the proposed RAM in setting the electric utility's allowed return in any rate proceeding, in addition to any other changes in business risk experienced by the electric utility;

Continuing the RAM will not change AmerenUE's business risk. The continuation of a fuel adjustment mechanism (the proposed RAM) would continue to allow AmerenUE to pass through to its customers increases and decreases in fuel costs without the need for a costly and time-consuming rate proceeding necessitated by changes in fuel costs. In recent years, the lack of a fuel adjustment mechanism in Missouri has been a major concern to the financial community because fuel costs have been highly volatile. Because fuel adjustment clauses predominantly are part of the regulation of other U.S. utilities, continuing a fuel adjustment mechanism will keep the business risk of AmerenUE more comparable to the risks of other utilities. Without a fuel adjustment mechanism, the business risk of AmerenUE would be higher than that of other utilities, all else being equal. However, since most of the electric utilities used in the sample groups of comparable companies in AmerenUE's cost of equity studies are able to recover their fuel costs through fuel adjustment clauses, the reduced risk of implementing the proposed RAM in Missouri is already reflected in AmerenUE's base cost of equity recommendation (11.5%) in this case.

(O) A description of how responses to subsections (B) through (N) differ from responses to subsections (B) through (N) for the currently approved RAM;

Item (B) has been updated to account for a line item on customers' bills relating to the environmental cost recovery mechanism requested in this case. Item (C) contains only minor changes, as discussed in the testimony to which this Schedule is attached and as shown in Schedule LMB-E3 to that testimony. Items (D), (F), (G), (K), and (N) are essentially the same as before. Item (E) is substantially the same as before, but contains updated information on the prevalence of FACs in the United States. Items (H) and (I) are very similar to prior Items (H) and (I), except for changes to the handling of quality adjustments in coal contracts (as addressed in the testimony to which this Schedule is attached) and to account for stipulated agreements relating to the existing FAC from the last rate case relating to replacement power insurance. Item (J) is similar to the prior Item (J), but has been updated to reflect updated information on FACs in Missouri and to reflect expectations regarding net fuel costs in the future. Item (L) is very similar to the prior Item (L), and includes additional information regarding practices relating to off-system sales. Item (M) has been updated to take into account the seasonal differentiation in the Company's FAC, and to update the net base fuel cost level in the FAC.

(P) The supply side and demand side resources that the electric utility expects to use to meet its loads in the next four (4) true-up years, the expected dispatch of those resources, the reasons why these resources are appropriate for dispatch and the heat rates and fuel types for each supply-side resource; in submitting this information, it is recognized that supply and demand-side resources and dispatch may change during the next four (4) true-up years based upon changing circumstances and parties will have the opportunity to comment on this information after it is filed by the electric utility;

Attachment C to this Schedule lists the supply- and demand-side resources expected to meet the AmerenUE load requirements for the periods July 1, 2010 to June 30, 2011, and each one-year period thereafter. The data in the table lists the resource name, ownership, primary fuel type, heat rate at full load, and projected generation for the four true-up years. The projected generation for these four years is appropriate because they were developed from a detailed production cost model run. The production cost model used by AmerenUE is the PROSYM production cost model. This is the same model that is used by AmerenUE in this case to calculate fuel, transportation and purchased power costs and off-system sales. The major inputs to the PROSYM production cost model include: normalized hourly loads, unit availabilities, fuel prices, unit operating characteristics, hourly energy market prices, and system requirements.

(Q) The results of heat rate tests and/or efficiency tests on all the electric utility's nuclear and non-nuclear steam generators, HRSG, steam turbines and combustion turbines conducted with the previous twenty-four (24) months;

Attachment D to this Schedule contains the results of heat rate tests that have been completed in the prior 24 months according to the heat rate/efficiency testing processes

implemented in connection with approval of the fuel adjustment clause in the Company's last rate case. These include reports (Performance Reports) of heat rate tests completed on the Company's coal-fired units, data from heat rate testing at the Callaway Plant, and available heat rate test results for the Company's CTG units.

(R) Information that shows that the electric utility has in place a long-term resource planning process, important objectives of which are to minimize overall delivered energy costs and provide reliable service;

On February 5, 2008, AmerenUE made its most recently required Integrated Resource Plan ("IRP") filing, reflecting that an important objective of AmerenUE's IRP process is to minimize overall delivered energy costs (i.e. least cost planning) and provide reliable service. This filing covers AmerenUE's long-term resource planning process and consisted of multiple volumes. AmerenUE's IRP filing reflected least cost analyses for a number of resource options and portfolios, and also examined the Company's capacity position and needs in detail. This information included AmerenUE's load forecasts as well as its analysis of available supply-side and demand-side resources. The end result is a twenty year resource plan. AmerenUE's filing was made in compliance with 4 CSR 240-22.010, et. seq. This very comprehensive Commission rule is designed to insure utilities provide energy services which "...are safe, reliable and efficient, at just and reasonable rates, in a manner that serves the public interest." 4 CSR 240-22.010(2). On May 5, 2009, AmerenUE provided a required notice to the Commission respecting a change to its preferred resource plan. The Company is also currently in the process of conducting the work necessary to make its next regularly scheduled IRP filing, which is due to be filed on February 5, 2011.

(S) If emissions allowance costs or sales margins are included in the RAM request and not in the electric utility's environmental cost recovery surcharge, a complete explanation of forecasted environmental investments and allowances purchases and sales;

Emissions allowance costs or sales margins are not included in the proposed FAC.

(T) Any additional information that may have been ordered by the Commission to be provided in the previous general rate proceeding.

The Commission has not ordered any additional information to be provided in connection with a continuation of the FAC.

**AmerenUE P.O. BOX 66529 ST. LOUIS, MO 63166-6529**

PRES RDG	PREV RDG	USE	READING	RATE	AMOUNT
08280	06695	1585	ACTUAL 1M SH		144.04
RIDER FAC ADJUSTMENT					1.58
RIDER ECRM ADJUSTMENT					1.58
ST LOUIS CITY MUNI TAX					6.00
<b>AMOUNT DUE ON 07/25</b>					<b>153.20</b>

FIRST CLASS MAIL  
U.S. POSTAGE  
PAID 1 OUNCE  
ST LOUIS, MO  
PERMIT NO. 2859

Service at: 1010 ABC STREET, UNIT 1F  
Service from 05/29 to 06/29/09 Days 31  
Last Payment 06/29/09 \$78.07  
Acct. No 12345-67890 Bill Date 07/15/09

**RETURN THIS STUB WITH PAYMENT TO:**

AmerenUE  
P.O. BOX 66529  
ST. LOUIS, MO 63166-6529

Acct. No. **12345-67890**

**JOHN DOE**  
**1010 ABC STREET, UNIT 1F**  
**SAINT LOUIS, MO 63104**

<b>AMT DUE</b>	<b>\$153.20</b>
<b>Due By</b>	<b>07/25</b>
<b>Delinquent After</b>	<b>08/05</b>

Attachment A



Please Return This Portion With Your Payment

AMOUNT DUE	DUE DATE
\$8,337.89	July 24, 2009
AMOUNT PAYABLE AFTER DUE DATE	ACCOUNT NUMBER
\$8,462.96	12345-67890

Amount Enclosed \$ \_\_\_\_\_

ABC MARKET  
1010 ABC STREET  
CHESTERFIELD, MO 63006

**AmerenUE**  
P. O. Box 66301  
St. Louis, MO 63166-6301



60600000 0012345678900 000008337890 000008337890

Keep This Portion For Your Records

ACCOUNT NUMBER	12345-67890
NAME	ABC MARKET
SERVICE	1010 ABC STREET
AT	CHESTERFIELD, MO 63006

BILL DATE	July 14, 2009
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TOTAL AMOUNT DUE BY	July 24, 2009	\$8,337.89
AMOUNT PAYABLE AFTER DUE DATE		\$8,462.96

Payment received on Jun 22, 2009 \$6,852.52

TYPE OF READING	METER NUMBER	SERVICE FROM TO	NO. DAYS	METER READING		READING DIFFERENCE	METER MULTIPLIER	THERM FACTOR	USAGE	R D
				PREVIOUS	PRESENT					
Total kWh	11111111	06/09-07/10	31	45840.0000	46999.0000	1159.0000	80.0000		92720.0000	A
Peak kW	11111111	06/09-07/10	31	0.0000	2.7500	2.7500	80.0000		220.0000	A

**SUMMARY**

Total kWh	Service To 07/10/2009	92720.0000	Peak kW	Service To 07/10/2009	220.0000
Total Billing Demand	07/10/2009	220.0000			
Billing Demand	07/10/2009	220.0000			

**METERED ELECTRIC SERVICE BILLING**

<b>Rate 3M LGS - General Service</b>	<b>Service From</b>	<b>06/09/2009 to 07/10/2009</b>
Demand Charge	220.0 KW @	\$3.78000000 \$831.60
Base Energy Chg / Hours Used	33,000.0 KWH @	\$0.08090000 \$2,669.70
Base Energy Chg / Hours Used	44,000.0 KWH @	\$0.06090000 \$2,679.60
Base Energy Chg / Hours Used	15,720.0 KWH @	\$0.04100000 \$644.52
Customer Charge		\$72.26
Rider FAC Adjustment	92,720.0 KWH @	\$0.00100000 \$92.72
Rider ECRM Adjustment	92,720.0 KWH @	\$0.00100000 \$92.72
Total Service Amount		\$7,083.12
Missouri State SalesTax		\$299.26
Missouri Local Sales Tax		\$254.99
Creve Coeur Annex Municipal Charge		\$700.52
Total Tax Related Charges		\$1,254.77

Current Amount Due	\$8,337.89
Prior Amount Due	\$0.00
<b>Total Amount Due</b>	<b>\$8,337.89</b>

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.



P. O. Box 66301  
St. Louis, MO 63166  
1-877-4AMEREN  
www.ameren.com

**Requirement (P) of 4 CSR 240-3.161(2)  
Supply and Demand Side Resources**

<u>Unit Name</u>	<u>Ownership</u>	<u>Primary Fuel Type</u>	<u>Heat Rate 12</u>				
			<u>Btu/Kwh</u>	<u>7/10-6/11</u>	<u>7/11-6/12</u>	<u>7/12-6/13</u>	<u>7/13-6/14</u>
				<u>(MWh)</u>	<u>(MWh)</u>	<u>(MWh)</u>	<u>(MWh)</u>
Callaway	AmerenUE	Nuclear	9,941	10,508,400	9,672,100	9,637,800	10,508,200
Labadie 1	AmerenUE	PRB Coal	9,677	943,800	970,700	983,600	983,800
Labadie 2	AmerenUE	PRB Coal	10,398	4,868,300	4,858,700	4,786,600	3,816,800
Labadie 3	AmerenUE	PRB Coal	10,050	4,715,400	4,728,600	3,499,000	4,441,800
Labadie 4	AmerenUE	PRB Coal	10,296	4,838,600	3,957,400	4,753,600	4,468,300
Rush 1	AmerenUE	PRB Coal	9,792	4,891,700	4,495,500	4,833,800	3,861,600
Rush 2	AmerenUE	PRB Coal	10,671	4,798,600	4,881,800	4,817,700	4,443,300
Sioux 1	AmerenUE	PRB /ILL Coal	9,673	3,220,700	2,955,700	3,508,000	3,381,000
Sioux 2	AmerenUE	PRB /ILL Coal	10,197	2,850,400	3,500,300	3,453,200	2,349,500
Meramec 1	AmerenUE	PRB Coal	11,603	875,000	901,900	688,100	805,600
Meramec 2	AmerenUE	PRB Coal	11,333	850,300	878,900	682,000	777,500
Meramec 3	AmerenUE	PRB Coal	11,649	1,772,000	1,901,300	1,907,600	1,459,100
Meramec 4	AmerenUE	PRB Coal	9,985	2,357,900	2,732,500	2,688,700	2,542,000
Audrain CT 1	AmerenUE	Gas	11,943	26,400	30,300	33,400	35,500
Audrain CT 2	AmerenUE	Gas	11,953	25,800	29,700	31,400	35,900
Audrain CT 3	AmerenUE	Gas	11,979	23,600	30,100	31,200	33,900
Audrain CT 4	AmerenUE	Gas	11,948	22,700	29,600	31,500	34,500
Audrain CT 5	AmerenUE	Gas	11,936	23,800	28,300	30,700	32,500
Audrain CT 6	AmerenUE	Gas	11,959	21,200	26,300	29,000	30,500
Audrain CT 7	AmerenUE	Gas	11,952	22,000	27,200	29,000	29,500
Audrain CT 8	AmerenUE	Gas	11,994	20,700	26,000	28,000	29,600
Fairgrounds CT	AmerenUE	Oil	12,345	-	-	-	-
Goose Creek CT 1	AmerenUE	Gas	11,931	30,300	32,800	32,900	36,500
Goose Creek CT 2	AmerenUE	Gas	11,959	28,700	32,200	31,400	38,100
Goose Creek CT 3	AmerenUE	Gas	11,971	27,800	31,600	31,700	38,600
Goose Creek CT 4	AmerenUE	Gas	11,935	29,200	31,200	32,600	37,300
Goose Creek CT 5	AmerenUE	Gas	11,937	28,800	32,600	31,900	35,200
Goose Creek CT 6	AmerenUE	Gas	11,952	28,500	29,600	30,600	34,100
Howard Bend CT	AmerenUE	Oil	12,728	-	-	-	-
Kinmundy CT 1	AmerenUE	Gas	12,000	-	-	-	-
Kinmundy CT 2	AmerenUE	Gas	12,115	-	-	-	-
Kirksville CT	AmerenUE	Gas	13,997	5,300	5,100	5,500	6,800
Meramec CT 1	AmerenUE	Oil	12,230	-	-	-	-
Meramec CT 2	AmerenUE	Gas	12,574	-	-	-	-
Mexico CT	AmerenUE	Oil	12,345	-	-	-	-
Moberly CT	AmerenUE	Oil	10,745	48,200	50,700	52,200	52,100
Moreau CT	AmerenUE	Oil	10,739	45,000	48,900	52,900	51,800
Peno Creek CT 1	AmerenUE	Gas	10,746	46,100	50,700	50,100	51,800
Peno Creek CT 2	AmerenUE	Gas	10,788	45,300	50,100	48,700	51,500
Peno Creek CT 3	AmerenUE	Gas	11,918	18,800	21,500	22,800	27,200
Peno Creek CT 4	AmerenUE	Gas	11,891	18,300	22,600	23,000	26,600
Pinkneyville CT 1	AmerenUE	Gas	11,914	19,300	25,700	23,300	28,000
Pinkneyville CT 2	AmerenUE	Gas	11,917	15,400	22,700	19,100	23,400
Pinkneyville CT 3	AmerenUE	Gas	11,402	34,700	39,100	42,700	43,400
Pinkneyville CT 4	AmerenUE	Gas	11,398	33,200	40,000	41,700	45,000
Pinkneyville CT 5	AmerenUE	Gas	10,177	34,700	36,000	36,800	40,100
Pinkneyville CT 6	AmerenUE	Gas	10,173	35,000	35,800	36,300	39,800
Pinkneyville CT 7	AmerenUE	Gas	10,165	34,700	36,100	36,100	39,800
Pinkneyville CT 8	AmerenUE	Gas	10,213	32,900	34,800	35,500	38,200
Raccoon Creek CT 1	AmerenUE	Gas	12,984	4,600	5,900	6,000	6,500
Raccoon Creek CT 2	AmerenUE	Gas	13,026	5,000	6,100	5,500	6,800
Raccoon Creek CT 3	AmerenUE	Gas	12,937	4,800	5,900	6,100	6,000
Raccoon Creek CT 4	AmerenUE	Gas	13,038	4,700	5,600	5,500	6,700
Venice CT 1	AmerenUE	Oil	15,798	-	-	-	-
Venice CT 2	AmerenUE	Gas	11,167	20,800	23,900	26,000	26,700
Venice CT 3	AmerenUE	Gas	10,935	80,000	100,200	108,900	119,500
Venice CT 4	AmerenUE	Gas	10,927	85,100	97,400	103,500	122,600
Venice CT 5	AmerenUE	Gas	11,431	35,300	42,400	44,500	53,000
Viaduct CTG	AmerenUE	Gas	18,235	300	300	200	200
Osage	AmerenUE	Pond Hydro		568,800	566,700	567,300	566,800
Keokuk	AmerenUE	Run of River Hydro		943,800	970,700	983,600	983,800
Taum Sauk 1	AmerenUE	Pumped Storage		405,950	413,600	412,550	399,050
Taum Sauk 2	AmerenUE	Pumped Storage		405,950	413,600	412,550	399,050
Wind	Purchase Power Begins in Sept 2009	Purchase Power Contract		338,100	339,200	338,100	338,100
Demand Side Management				538,060	711,813	916,639	1,114,721