

Exhibit No.:

Issue(s):

Witness:

Sponsoring Party:

Case No.:

Changes to Decommissioning
Trust Fund

Trippensee/Direct
Public Counsel

EO-2001-245

DIRECT TESTIMONY
OF
RUSSELL W. TRIPPENSEE

Submitted on Behalf of
the Office of the Public Counsel

UNION ELECTRIC COMPANY

Case No. EO-2001-245

December 1, 2000

FILED³
DEC 01 2000
Missouri Public
Service Commission

FILED

DEC - 1 2000

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of the Application of Union)
Electric company (d/b/a AmerenUE) for an)
Order to Approve the Change of Trustee for)
its Tax Qualified Nuclear Decommissioning)
Trust Fund and to Approve Related)
Changes to the Trust Agreement)

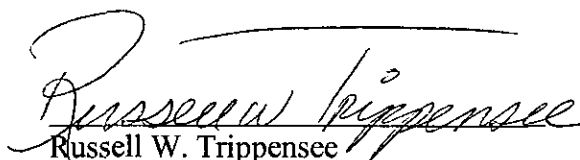
Case No. EO-2001-245

AFFIDAVIT OF RUSSELL W. TRIPPENSEE

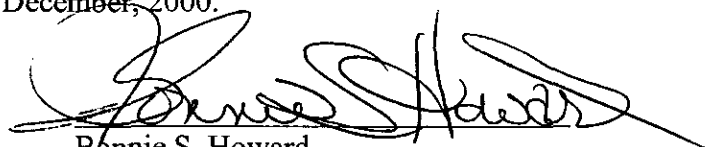
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Russell W. Trippensee, of lawful age and being first duly sworn, deposes and states:

1. My name is Russell W. Trippensee. I am the Chief Public Utility Accountant for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony consisting of pages 1 through 12 and Schedule RWT-1.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Russell W. Trippensee

Subscribed and sworn to me this 1st day of December, 2000.


Bonnie S. Howard
Notary Public

My commission expires May 3, 2001



DIRECT TESTIMONY

OF

RUSSELL W. TRIPPENSEE

UNION ELECTRIC COMPANY

CASE NO. EO-2001-245

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Service Commission

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. Russell W. Trippensee. I reside at 1020 Satinwood Court, Jefferson City, Missouri 65109, and my
3 business address is P.O. Box 7800, Jefferson City, Missouri 65102.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am the Chief Utility Accountant for the Missouri Office of the Public Counsel (OPC or Public
6 Counsel).

7 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

8 A. I attended the University of Missouri at Columbia, from which I received a BSBA degree, major in
9 Accounting, in December 1977. I attended the 1981 NARUC Annual Regulatory Studies Program
10 at Michigan State University.

11 **Q. HAVE YOU PASSED THE UNIFORM CPA EXAM?**

12 A. Yes, I hold certificate number 14255 in the State of Missouri. I have not met the two-year
13 experience requirement necessary to hold a license to practice as a CPA.

14 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.**

15 A. From May through August, 1977, I was employed as an Accounting Intern by the Missouri Public
16 Service Commission (MPSC or Commission). In January 1978 I was employed by the MPSC as a

1 Public Utility Accountant I. I left the MPSC staff in June 1984 as a Public Utility Accountant III
2 and assumed my present position.

3 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL AFFILIATIONS.**

4 A. I served as the chairman of the Accounting and Tax Committee for the National Association of
5 State Utility Consumer Advocates from 1990-1992 and am currently a member of the committee. I
6 am a member of the Missouri Society of Certified Public Accountants.

7 **Q. PLEASE DESCRIBE YOUR WORK WHILE YOU WERE EMPLOYED BY THE MPSC**
8 **STAFF.**

9 A. Under the direction of the Chief Accountant, I supervised and assisted with audits and examinations
10 of the books and records of public utility companies operating within the State of Missouri with
11 regard to proposed rate increases.

12 **Q. WHAT IS THE NATURE OF YOUR CURRENT DUTIES WITH THE OFFICE OF**
13 **THE PUBLIC COUNSEL?**

14 A. I am responsible for the Accounting and Financial Analysis sections of the Office of the Public
15 Counsel and coordinating their activities with the rest of our office and other parties in rate
16 proceedings. I am also responsible for performing audits and examinations of public utilities and
17 presenting the findings to the MPSC on behalf of the public of the State of Missouri.

18 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MPSC?**

19 A. Yes. I filed testimony in the cases listed on Schedule RWT-1 of my testimony on behalf of the
20 Missouri Office of the Public Counsel or MPSC Staff.

1 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

2 A. I will outline Public Counsel's concerns with Union Electric Company (UE or Company) various
3 proposed changes to the following documents: (1) Second Amended and Restated Tax Qualified
4 Decommissioning Trust (Trust) and (2) Investment Guidelines for the Callaway Plant Tax
5 Qualified and Non-Tax Qualified Nuclear Decommissioning Trust Funds (Guidelines). I will also
6 point out general areas of agreement with the proposed changes to these documents.

7 **Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF KEVIN L. REDHAGE**
8 **ALONG WITH THE ATTACHED EXHIBITS TO SAID TESTIMONY FILED ON**
9 **OCTOBER 16, 2000 ON BEHALF OF THE COMPANY?**

10 A. Yes.

11 **Q. HOW DOES MR. REDHAGE CHARACTERIZE THE CHANGES PROPOSED BY THE**
12 **COMPANY?**

13 A. Mr. Redhage proposes that UE be authorized to appoint the Bank of New York (BNY) as both
14 investment manager and trustee of the Callaway Nuclear Facilities decommissioning fund. Mr.
15 Redhage also proposes language changes that he characterizes as not being material nor significant.
16 Attached to Mr. Redhage's testimony are the current effective versions of the Trust (Schedule 5 to
17 Mr. Redhage's testimony) and the Guidelines (Schedule 8 to Mr. Redhage's testimony). Attached,
18 as Schedules 6 (Trust) and 9 (Guidelines) to Mr. Redhage's testimony are the proposed revised
19 versions of the respective documents. Mr. Redhage's schedules 7 (Trust) and 10 (Guidelines)
20 purport to compare the current and proposed versions of the two respective documents using a
21 strike-out to indicate language that has been eliminated and shaded background to indicate

1 language that has been added although the shading is not visible on the documents provided to OPC
2 by the Company.

3 **Q. HAS THE COMPANY FILED A REVISED SCHEDULE 6 TO MR. REDHAGE'S**
4 **TESTIMONY?**

5 A. Yes. The Company filed the revised documents on November 27, 2000 in a pleading to this
6 Commission. The Company suggested that these documents would address Public Counsel
7 concerns about "minor wording changes" contained in the revised documents (Trust). This filing
8 also purports to provide a comparative document. (Note: the background shading in the document
9 supplied to OPC by the Company does not show all of the changes the Company is proposing to the
10 current effective document found as Schedule 5 to Mr. Redhage's direct testimony. The
11 background shading only shows changes as compared to Mr. Redhage's Schedule 6)

12 **Q. HAVE THOSE MINOR WORDING CHANGES ADDRESSED PUBLIC COUNSEL'S**
13 **CONCERNS?**

14 A. No. The wording changes proposed by the Company were in response to Staff concerns, not Public
15 Counsel concerns. The pleading correctly states that Staff reviewed the document prior to its being
16 filed, but Public Counsel was not provided that opportunity.

17 Public Counsel believes that some of the proposed changes (Redhage Schedule 6 as filed and as
18 revised in November 27, 2000 filing) are contrary to the intent of the Commission's original
19 decision in EO-85-17 et al. Furthermore some changes would allow the Company access to the
20 funds. Finally, despite the Company's assertion to the contrary, these changes have not been

1 identified in the documents filed with the Commission in either Mr. Redhage's direct testimony or
2 in the November 27, 2000 revision filing.

3 **Q. PLEASE OUTLINE PUBLIC COUNSEL'S POSITION.**

4 A. Public Counsel proposes that the Commission approve the Company's request to appoint a new
5 trustee. Public Counsel also believes numerous wording changes proposed in the two documents
6 should be approved. However, Public Counsel does believe that wording changes that address the
7 following areas violate the intent of the original Commission order, Case No EO-85-17, authorizing
8 the decommissioning trust fund and therefore should not be approved.

9 Specifically Public Counsel opposes the Company proposal to add or delete language that addresses
10 the following areas.

- 11 1. Injection of the Company into management of the Trust
- 12 2. Elimination of the definition of decommissioning costs
- 13 3. Trust fund disbursement upon sale of Callaway Nuclear Plant

14 My testimony will address the specific language changes to which Public Counsel objects and also
15 provide the Commission with recommended substitute language.

16 **Q. PLEASE EXPLAIN IN GENERAL TERMS WHY PUBLIC COUNSEL BELIEVES**
17 **SOME OF THE PROPOSED CHANGES ARE CONTRARY TO THE ORIGINAL**
18 **TERMS OF THE COMMISSION DECISION.**

19 A. The proposed changes in this case would allow UE to inject itself into the management of the fund.
20 The MPSC approved an external decommissioning fund with an independent trustee in Case No.

EO-85-17 et al. The Commission rejected UE's position that it be allowed to use an internal mechanism to fund a decommissioning fund even though this approach would have been at a lower cost to the customers (Re: Union Electric Company, 27 Mo. P.S.C. N.S. 183, 256-257). Clearly the Commission intended independent management of the fund outside of UE's control. Discussion with counsel raises serious concerns as to the ambiguities in interpretation of the documents related to the extent of UE's control over the fund.

Q. PLEASE ELABORATE ON WHICH PROPOSED REVISIONS COULD INJECT UE INTO THE MANAGEMENT OF THE FUND.

A. A proposed new paragraph in Article V. section B. of the Guidelines appears on page 4 of Schedules 9 and 10 of Mr. Redhage's testimony. Public Counsel agrees with the overall intent of the new paragraph requiring UE to monitor the fund to insure certain guidelines are being followed. The new paragraph reads as follows:

UE shall monitor the actual equity allocation value, and shall direct the investment managers(s) **regarding the appropriate actions to take** to adjust the jurisdictional sub-account to maintain the targeted equity allocation, when necessary.

(emphasis added by OPC to indicate portion of Company proposed language OPC believes should not be approved)

The bolded and underlined phrase in the quoted paragraph is not necessary for purposes of monitoring and should not be added to the Guidelines language as proposed by the Company. Public Counsel believes that the phrase would allow for an interpretation that the Company could direct specific investment actions necessary to meet the equity allocation targets. This

1 interpretation would be contrary to the intent of an external fund with an independent trustee.

2 Elimination of this phrase would not dilute the monitoring function.

3 **Q. IS THERE ANOTHER PROPOSED CHANGE THAT ALSO COULD LEAD TO THE**
4 **COMPANY INJECTING ITSELF INTO THE MANAGEMENT OF THE FUND?**

5 A. Yes. Under Article II, section 2.01 of the Trust, the following sentence appears:

6 Selection of the investment media for the investment and reinvestment of the
7 principal and income of the Trust Fund shall be in the sole discretion of the
8 Trustee, except for any portion of the Trust Fund that may be subject to the
9 instructions of the Company or of an additional investment advisor; provided,
10 however, that investments shall be so diversified as to minimize the risk of large
11 losses unless under the circumstances it is clearly prudent not to do so; and further
12 provided that non the written request of the Company to retain cash, the Trustee
13 shall retain so much cash as shall be specified in such request and shall be under no
14 obligation to invest the same as herein provided, and also that the Trustee in its
15 discretion may retain cash temporarily awaiting investment.

16 (Emphasis added by OPC to indicate Company proposed language that should not
17 be approved)

18 (Redhage testimony, Schedules 6 & 7, page 6)

19 The bolded and underlined phrase in the quoted paragraph is not necessary for purposes of insuring
20 that the trustee makes prudent investment decisions. Public Counsel believes that the phrase would
21 allow the Company the ability to direct specific investment actions necessary to meet the equity
22 allocation targets. A provision allowing such actions is contrary to the intent of an external fund
23 with an independent trustee.

24 **Q. DOES PUBLIC COUNSEL HAVE ANOTHER CONCERN REGARDING PROPOSED**
25 **CHANGES RELATED TO THE USE OF DECOMMISSIONING FUNDS?**

1 A. Yes a proposed change to the Trust document eliminates the specific instructions regarding what
2 decommissioning costs and expenses shall be eligible for coverage by the trust. The following
3 sentence is proposed to be eliminated from Article I, section 1.01:

4 The anticipated decommissioning costs and expenses shall include all reasonable
5 costs and expenses incurred in connection with the entombment, decontamination,
6 dismantlement, removal and disposal of the structures, systems and components of
7 the Callaway Plant at the time of decommissioning, including al expenses to be
8 incurred in connection with the preparation for decommissioning, such as
9 engineering and other planning expenses, and to be incurred after the actual
10 decommissioning occurs, such as physical security and radiation monitoring
11 expenses, less proceeds of insurance, salvage or resale of machinery, construction
12 equipment or apparatus the cost of which was charged as a decommissioning
13 expense.

14 (Redhage testimony, Schedule 7, page 4)

15 Public Counsel does not believe elimination of this language serves any purpose that benefits UE
16 customers or Missouri. On the contrary, this language sets forth the specific purpose of the trust.

17 **Q. DOESN'T THE COMPANY PROPOSE TO ADD LANGUAGE, IN ARTICLE I,**
18 **SECTION 1.04 OF THE TRUST, THAT DISCUSSES HOW THE ASSETS OF**
19 **THE TRUST MUST BE USED?**

20 A. Yes. The following sentence is a proposed addition to the Trust on Section 1.04:

21 The assets of the Trust Fund must be used as authorized by the Code and the
22 regulations thereunder.

23 (Redhage testimony, Schedule 7, page 6)

24 **Q. WHY DOES PUBLIC COUNSEL BELIEVE THAT THIS LANGUAGE DOES NOT**
25 **ADEQUATELY OUTLINE DISBURSEMENTS OF THE FUND?**

1 A. The language eliminated addresses specific decommissioning procedures related to a specific
2 nuclear facility. In contrast, the Code (Internal Revenue Code) section 468A(e)(4) addresses very
3 broadly "any liability of any person contributing to the Fund for the decommissioning of a nuclear
4 powerplant". Elimination of the specific definition of decommissioning costs increase the
5 likelihood of differing legal interpretations and future litigation. The Commission's intended
6 purpose of this fund is as follows:

7 The Commission wants to ensure that the moneys paid by ratepayers during the
8 life of the plant are available for decommissioning.

9 (27 Mo. P.S.C. (N.S.) 257)

10 Public Counsel does not believe the proposed language provides any additional clarity, in fact,
11 specificity is removed and the language becomes more subject to interpretation subject to ones
12 perspective or wishes.

13 **Q. WHAT IS THE EFFECT OF THE ELIMINATION OF THE DEFINITION OF**
14 **DECOMMISSIONING COSTS AND REPLACING IT WITH THE IRS CODE**
15 **REFERENCE?**

16 A. It essentially substitutes the IRS definition for Missouri requirements.

17 **Q. DOES THE COMPANY'S PROPOSED LANGUAGE ESSENTIALLY MAKE**
18 **COMPLIANCE WITH THE IRS CODE THE PRINCIPLE DRIVER IN THE IN**
19 **THE DESIGN OF THE TRUST?**

20 A. Yes.

1 Q. WAS COMPLIANCE WITH THE IRS CODE A BASIC REQUIREMENT AS
2 DETERMINED BY THE COMMISSION IN AUTHORIZING THE EXTERNAL
3 TRUST FUND?

4 A. No. The Commission approved an external trust fund over UE objections that there was no
5 guarantee that such a fund would be acceptable to the IRS. (27 Mo. P.S.C. (N.S.) 183, 257).
6 Clearly, the Commission did not believe that the IRS code should be the driving force in the design
7 of the Trust.

8 Q. DOES THE COMPANY ALSO PROPOSE CHANGES THAT ELIMINATE
9 REFERENCES TO LIABILITIES RELATED TO THE DECOMMISSIONING OF
10 THE CALLAWAY PLANT IN THE EVENT OF A SALE OF THE CALLAWAY
11 NUCLEAR GENERATING FACILITY?

12 A. Yes. The Company proposes to eliminate the following phrase's bolded components from Article
13 3, section 3.05 of the Trust:

14 In the event the Company sells or otherwise disposes of its ownership interest, or
15 any part hereof, in the Callaway Plant, the funds of the Trust shall be distributed to
16 the Company **to the extent of the reductions in its liability for future**
17 **decommissioning after taking into account the liabilities of the Company for**
18 **future decommission of the Callaway Plant and the liabilities that have been**
19 **assumed by another entity.**

20 (Redhage testimony, Schedule 7, page 10)

21 The Company replaces the bolded phrase above with:

22 in the manner prescribed by written instruction from the Company delivered to the
23 Trustee

24 (Redhage testimony, Schedule 7, page 10)

1 **Q. THE COMPANY HAS INCLUDED NEW LANGUAGE IN ITS PLEADING FILED**
2 **ON NOVEMBER 27, 2000 THAT PROVIDES THAT ANY INSTRUCTION SHALL**
3 **BE IN COMPLIANCE WITH ALL ORDERS ISSUED BY ANY APPLICABLE**
4 **FEDERAL OR STATE REGULATORY AUTHORITY. DOES THIS SATISFY**
5 **PUBLIC COUNSEL'S CONCERNS?**

6 A. No. The proposal, as contained in Mr. Redhage's direct testimony and amended by the November
7 27, 2000 filing, would still allow the Company the flexibility to litigate how the fund was designed
8 to be disbursed. The possibility of litigation introduces uncertainty into a process that the
9 Commission has previously found should not exist (Re: Union Electric Company, 27 Mo. P.S.C.
10 (N.S.) 183, 257). The only purpose for this fund and disbursement from it is to decommission the
11 Callaway Nuclear Plant. Any changes that could confuse this purpose, should be rejected.

12 **Q. DOES PUBLIC COUNSEL HAVE CONCERNS REGARDING THE PRESENTATION**
13 **OF THE COMPANY'S TESTIMONY AND PROPOSED CHANGES TO THE TWO**
14 **DOCUMENTS BEING DISCUSSED?**

15 A. Yes. Mr. Redhage asserts that Schedules 7 and 10 to his direct testimony provide a comparison of
16 the current and proposed versions of the two respective documents utilizing a strike-out to indicate
17 language deleted and a background shading to indicate new language. The same is true with regard
18 to Schedule 2 of the amended application filed on November 27, 2000. Unfortunately the
19 background shading has not been successfully reproduced in the hardcopies received by Public
20 Counsel. If the hardcopies filed with the Commission contain similar production errors, the full
21 extent of the proposed changes will not be readily apparent from Company's filings.

1 **Q. ARE THERE CHANGES PUBLIC COUNSEL BELIEVES ARE APPROPRIATE IN**
2 **THE TWO DOCUMENTS RELATED TO THE DECOMMISSIONING TRUST FUND?**

3 A. Yes. Public Counsel has no dispute with the Company being able to make a recommendation to
4 change the trustee. The evidence presented by the Company would appear to indicate that the Bank
5 of New York is a suitable trustee.

6 Public Counsel has also not taken issue with numerous other changes to the documents that are
7 truly not material or significant in nature. However, Public Counsel's serious objection to
8 substantive changes in language have been outlined in my testimony.

9 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

10 A. Yes.

Direct Testimony
Russell W. Trippensee
Case No. EO-2001-245

Missouri Power & Light Company, Steam Dept., Case No. HR-82-179
Missouri Power & Light Company, Electric Dept., Case No. ER-82-180
Missouri Edison Company, Electric Dept., Case No. ER-79-120
Southwestern Bell Telephone Company, Case No. TR-79-213
Doniphan Telephone Company, Case No. TR-80-15
Empire District Electric Company, Case No. ER-83-43
Missouri Power & Light Company, Gas Dept., Case No. GR-82-181
Missouri Public Service Company, Electric Dept., Case No. ER-81-85
Missouri Water Company, Case No. WR-81-363
Osage Natural Gas Company, Case No. GR-82-127
Missouri Utilities Company, Electric Dept., Case No. ER-82-246
Missouri Utilities Company, Gas Dept., Case No. GR-82-247
Missouri Utilitites Company, Water Dept., Case No. WR-82-248
Laclede Gas Company, Case No. GR-83-233
Great River Gas Company, Case No. GR-85-136 (OPC)
Northeast Missouri Rural Telephone Company, Case No. TR-85-23 (OPC)
United Telephone Company, Case No. TR-85-179 (OPC)
Kansas City Power & Light Company, Case No. ER-85-128 (OPC)
Arkansas Power & Light Company, Case No. ER-85-265 (OPC)
KPL/Gas Service Company, GR-86-76 (OPC)
Missouri Cities Water Company, Case Nos. WR-86-111, SR-86-112 (OPC)
Union Electric Company, Case No. EC-87-115 (OPC)
Union Electric Company, Case No. GR-87-62 (OPC)
St. Joseph Light and Power Company, Case Nos. GR-88-115, HR-88-116 (OPC)
St. Louis County Water Company, Case No. WR-88-5 (OPC)
West Elm Place Corporation, Case No. SO-88-140 (OPC)
United Telephone Long Distance Company, Case No. TA-88-260 (OPC)
Southwestern Bell Telephone Company, Case No. TC-89-14, et al. (OPC)
Osage Utilities, Inc., Case No. WM-89-93 (OPC)
GTE North Incorporated, Case Nos. TR-89-182, TR-89-238, TC-90-75 (OPC)
Contel of Missouri, Inc., Case No. TR-89-196 (OPC)
The Kansas Power and Light Company, Case No. GR-90-50 (OPC)
Southwestern Bell Telephone Company, Case No. TO-89-56 (OPC)
Capital City Water Company, Case No. WR-90-118 (OPC)

Direct Testimony
Russell W. Trippensee
Case No. EO-2001-245

Laclede Gas Company, Case No. GR-90-120 (OPC)
Southwestern Bell Telephone Company, Case No. TR-90-98 (OPC)
Empire District Electric Company, Case No. ER-90-138 (OPC)
Associated Natural Gas Company, Case No. GR-90-152 (OPC)
Southwestern Bell Telephone Company, Case No. TO-91-163
Union Electric Company, Case No. ED-91-122
Missouri Public Service, Case Nos. EO-91-358 and EO-91-360
The Kansas Power and Light Company, Case No. GR-91-291
Southwestern Bell Telephone Co., Case No. TO-91-163
Union Electric Company, EM-92-225 and EM-92-253
Southwestern Bell Telephone Company, TO-93-116
Missouri Public Service Company, ER-93-37, (January, 1993)
Southwestern Bell Telephone Company, TO-93-192, TC-93-224
Saint Louis County Water Company, WR-93-204
United Telephone Company of Missouri, TR-93-181
Raytown Water Company, WR-94-300
Empire District Electric Company, ER-94-174
Raytown Water Company, WR-94-211
Missouri Gas Energy, GR-94-343
Capital City Water Company, WR-94-297
Southwestern Bell Telephone Company, TR-94-364
Missouri Gas Energy, GR-95-33
St. Louis County Water Company, WR-95-145
Missouri Gas Energy, GO-94-318
Alltel Telephone Company of Missouri, TM-95-87
Southwestern Bell Telephone Company, TR-96-28
Steelville Telephone Exchange, Inc., TR-96-123
Union Electric Company, EM-96-146
Imperial Utilites Corporation, SC-96-247
Laclede Gas Company, GR-96-193
Missouri Gas Energy, GR-96-285
St. Louis County Water Company, WR-96-263
Village Water and Sewer Company, Inc. WM-96-454
Empire District Electric Company, ER-97-82

Direct Testimony
Russell W. Trippensee
Case No. EO-2001-245

UtiliCorp d/b/a Missouri Public Service Company, GR-95-273
Associated Natural Gas, GR-97-272
Missouri Public Service, ER-97-394, ET-98-103
Missouri Gas Energy, GR-98-140
St. Louis County Water, WO-98-223
United Water Missouri, WA-98-187
Kansas City Power & Light/Western Resources, Inc. EM-97-515
St. Joseph Light & Power Company, HR-99-245
St. Joseph Light & Power Company, GR-99-246
St. Joseph Light & Power Company, ER-99-247
AmerenUE, EO-96-14, (prepared statement)
Missouri American Water Company, WR-2000-281
Missouri American Water Company, SR-2000-282
UtiliCorp United Inc./St. Joseph Light & Power Company, EM-2000-292
UtiliCorp United Inc./Empire District Electric Company, EM-2000-369
St. Joseph Light & Power Company, EO-2000-845
St. Louis County Water Company, WR-2000-844
Union Electric Company, EO-2001-245