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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2011-0028

DIRECT TESTIMONY

OF

WILBON L. COOPER

ON

BEHALF OF

**UNION ELECTRIC COMPANY
d/b/a AmerenUE**

**St. Louis, Missouri
September, 2010**

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DIRECT TESTIMONY
OF
WILBON L. COOPER
CASE NO. ER-2011-0028
I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Wilbon L. Cooper. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and in what capacity?

A. I am employed by Union Electric Company d/b/a AmerenUE (“AmerenUE” or the “Company”) as the Manager of the Rates and Tariff Department.

Q. Please describe your educational background and employment experience.

A. I have a Bachelor of Science degree in Electrical Engineering from the University of Missouri-Rolla.

I was employed as an Assistant Engineer in the Rate Engineering Department of Union Electric in June 1980. My work included assignments relating to the general analyses and administration of various aspects of Union Electric’s electric, gas, and steam rates. In October 1989, I was appointed Supervising Engineer – Rate Analysis in the Rate Engineering Department of Corporate Planning at Ameren Services Company. In this position, I was responsible for meeting the analytical requirements for the Company's retail gas and electric rates and wholesale electric rates, including load research and

1 various cost of service and rate design studies, as assigned. I was appointed to my
2 present position of Manager of Rates and Tariffs in March 2003.

3 I currently have responsibility for the general policies and practices associated
4 with the day-to-day administration and design of AmerenUE's electric and gas rate
5 tariffs, riders and rules and regulations tariffs on file with the Missouri Public Service
6 Commission ("Commission") and in the participation in various proceedings before this
7 regulatory agency. In addition, Rates and Tariffs is responsible for conducting class cost
8 of service and rate design studies and the participation in other projects of a general
9 corporate nature, as requested by the Company's Vice President Regulatory and
10 Legislative Affairs.

11 I have previously submitted testimony before the regulatory commissions of
12 Missouri, Illinois, and Iowa.

13 **II. PURPOSE AND SUMMARY OF TESTIMONY**

14 **Q. What is the purpose of your direct testimony in this proceeding?**

15 A. My direct testimony discusses: a) the revenue increase being proposed for
16 the Company's electric retail rate classes; b) the development and results of a class cost
17 of service study being submitted in connection with the direct testimony of AmerenUE
18 witness William M. Warwick as part of this case; c) the design and development of the
19 individual class rates; and (d) a study addressing declining block Residential winter rates.

20 **Q. Are you sponsoring any schedules for presentation to the Commission**
21 **in this proceeding?**

1 A. Yes. I am sponsoring eight schedules. The first three, discussed
2 immediately below, provide a summary of the rate increase requested in this case. I
3 discuss the remaining schedules throughout my direct testimony.

4 **Q. Please identify Schedule WLC-E1.**

5 A. Schedule WLC-E1 consists of thirty-four (34) tariff sheets, which reflect
6 the revised rate tariffs. These tariffs, taken as a whole, would provide an increase in the
7 Company's net Missouri electric jurisdictional normalized test year revenues of
8 approximately \$263.3 million, or approximately 10.8%, over the annualized test year
9 base rate¹ revenue that would be realized from the tariffs which are effective at the time
10 of filing.

11 **Q. Please identify Schedule WLC-E2.**

12 A. Schedule WLC-E2 shows the distribution of the proposed net revenue
13 increase to the Company's various proposed rate service classifications resulting from the
14 rates contained in the proposed tariffs in Schedule WLC-E1, excluding gross receipts
15 taxes levied on customer billings by the various municipalities within the Company's
16 service area.

17 **Q. Please identify Schedule WLC-E3.**

18 A. Schedule WLC-E3 illustrates the effects of the proposed rates in the tariffs
19 in Schedule WLC-E1 upon typical monthly bills of customers served under the
20 Company's non-lighting rate service classifications.

¹ The test year in this case is the 12 months ending March 31, 2010, with certain pro forma adjustments discussed in the direct testimony of AmerenUE witness Gary S. Weiss, including as adjusted for customer growth through February 28, 2011.

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III. CLASS COST OF SERVICE STUDY

A. Class Cost of Service Concepts and Operating System Components

Q. Please explain what is meant by “class cost of service.”

A. The Company currently provides service to its customers in a number of rate classifications that are designated for residential or non-residential service. The non-residential customer group is differentiated by customer size and the voltage level at which the Company provides service. The current customer classes are Residential, Small General Service ("SGS") and Large General Service ("LGS") (all of which have their service delivered at a low secondary voltage level); Small Primary Service ("SPS") and Large Primary Service ("LPS") (delivery at a high voltage level); Large Transmission Service ("LTS") (delivery at a “transmission” voltage level) and Lighting Service (both area and street lighting). A class cost of service study provides a basis for allocating and/or assigning the Company’s total jurisdictional cost of providing electric service to these various customer classes in a manner that reflects cost causation. The results of a class cost of service study with equalized rates of return are often referred to as “class revenue requirements." Mr. Warwick conducted a class cost of service study for this case, under my supervision, and he is sponsoring that study in direct testimony filed in this proceeding.

Q. How are the results of a class cost of service study used by the Company?

A. These study results are typically used to develop the target level of annual revenue that the Company should recover from each customer class through the

1 application of the rates or charges within the Company tariffs under which the various
2 customer classes are being served.

3 **Q. Please explain your use of the term “rate design.”**

4 A. The term “rate design” refers both to the process of establishing the
5 specific charges (e.g. monthly customer charges, dollars per kilowatt of demand and/or
6 cents per kilowatt-hour energy charges) for each customer class, as well as to the actual
7 structure of an individual class rate. The rate design, or structure, of a given class rate
8 may range in complexity from a simple structure consisting of a monthly customer
9 charge and a flat charge per kilowatt-hour (such as the Company’s summer Residential
10 rate), to a more complex set of customer, demand, energy and reactive charges (such as
11 the Company’s SPS, LPS and LTS rates). In all instances, however, the charges within a
12 specific rate classification are established such that the application of these individual
13 charges to the total annual customer class electrical usage will result in the collection of
14 the targeted annual revenue requirement of each of the Company’s retail rate classes.

15 **Q. As background for additional discussion on the class cost of service**
16 **study the Company is sponsoring in this case, please provide a general description**
17 **of the various facilities utilized by the Company in producing and delivering**
18 **electricity to its customers.**

19 A. Schedule WLC-E4 of my testimony is a simplified diagram illustrative of
20 the AmerenUE electric system, showing how power flows from the generating station
21 and is then transmitted and distributed to the home of a residential customer. Other
22 customers receiving service at higher voltage levels are also served from various points
23 on the same system.

1 **Q. Please describe, in more detail, how the Company's system operates.**

2 A. As illustrated in Schedule WLC-E4, electrical power is produced at the
3 Company's generating stations at voltage levels ranging from 11,000 to 23,750 volts. To
4 achieve transmission operating economies, this voltage is raised, or stepped up, by power
5 transformers at the generating station sites to voltages generally ranging from 138,000 to
6 345,000 volts for transmission to the Company's bulk substations that are strategically
7 located throughout its service area.

8 **Q. What is the function of the Company's bulk substations?**

9 A. Bulk substations receive electrical power at transmission voltage levels.
10 They then lower, or step-down, this power to transmission or distribution voltages
11 generally ranging from 138,000 volts to 34,500 or 69,000 volts. Such power is then
12 distributed over the Company's 34,500 or 69,000 volt distribution lines to distribution
13 substations located throughout the Company's service area.

14 **Q. What function do distribution substations perform?**

15 A. Distribution substations, which are far more numerous than bulk
16 substations, provide a further reduction in the electrical power voltage to a range of 4,160
17 to 13,800 volts within various portions of the Company's service area. The power is then
18 distributed over the Company's 4,160 to 13,800 volt distribution lines to points at or near
19 the premises of the Company's customers.

20 **Q. After electrical power at 4,160 to 13,800 volts is delivered to a point at
21 or near a customer's premises, do any further reductions in voltage take place?**

22 A. Yes, in most instances. While approximately 650 of the Company's
23 largest industrial and commercial customers in Missouri take service at the 4,160 to

1 13,800 volt range or higher, the majority of the Company's customers are served at lower
2 voltages, ranging from 120 to 480 volts. The lower voltages are achieved through the use
3 of numerous line transformers located at or near the customer's premises. This low
4 voltage electrical power from the line transformer is delivered to a customer's premises
5 over low voltage lines referred to as "secondary" and "service" lines.

6 **Q. What voltages are utilized in providing electric service to residential**
7 **customers?**

8 A. Residential customers are served at either 120 or 240 volts depending
9 upon the customer's service entrance panel size and connected appliances.

10 **Q. What voltages are utilized to serve non-residential customers?**

11 A. Non-residential customers on the Company's SGS or LGS rates are served
12 at voltages from 120 to 480 volts due to the wide variety of electrical consuming devices
13 utilized by such customers. Customers in the latter voltage range are often referred to as
14 "secondary" voltage customers. Other larger non-residential customers receiving service
15 at 4,160 to 13,800 volts are referred to as "primary" voltage customers. The Company
16 also serves approximately 75 customers in Missouri at voltages above the 13,800 volt
17 level. These are referred to as "high voltage" or Rider B customers. Additionally, the
18 Company serves its only current LTS customer at 161 kilovolts ("kV") via a unique
19 transmission service arrangement.

20 **Q. In your description of the AmerenUE generation, transmission and**
21 **distribution system are you using the term "lines" in a general sense?**

22 A. Yes. Those "lines" may be overhead conductors or underground cables.
23 Overhead "lines" include all poles, towers, insulators, crossarms and all other hardware

1 associated with such installations. Underground "lines" include direct buried cable, as
2 well as that installed in single or multi-duct conduit, and other associated hardware.

3 **B. Costs and Revenues in Class Cost of Service Study**

4 **Q. Please describe the components of costs and revenues that are**
5 **contained in the class cost of service study that the Company is filing in this case.**

6 A. A traditional cost of service study incorporates the aggregate jurisdictional
7 (Missouri or Federal Energy Regulatory Commission ("FERC")) accounting and
8 financial data normally submitted to a regulatory commission by a utility in support of a
9 request for an adjustment in its overall rate levels. Such a study is required to determine
10 the level of revenues necessary for the Company to recover its operating and maintenance
11 expenses, depreciation applicable to its investment in utility plant, property taxes, income
12 and other taxes, and provide a fair rate of return to the Company's investors, through its
13 rates. The Company's class cost of service study allocates, or distributes, these total
14 jurisdictional costs to the various customer classes in a cost based manner that fairly and
15 equitably reflects the cost of the service being provided to each customer class.

16 **Q. Was a Missouri jurisdictional cost of service study performed by the**
17 **Company's Regulatory Accounting group the starting point for the class cost of**
18 **service study performed and sponsored by Mr. Warwick?**

19 A. Yes, it was. As I indicated above, the Company's class cost of service
20 study is a continuation and refinement of the Missouri jurisdictional cost of service study
21 discussed in the direct testimony of Mr. Weiss, resulting in a determination of the costs
22 incurred in providing electric service to each of the Company's customer classes.

1 **Q. What major categories of cost were examined in the development of**
2 **the class cost of service study being sponsored by Mr. Warwick in this case?**

3 A. A detailed analysis was made of all elements of the Company's Missouri
4 jurisdictional rate base investment and expenses during the test year for the purpose of
5 allocating such items to the Company's present customer classes. This analysis consisted
6 of classifying the various elements of cost into their customer-related, energy-related and
7 demand-related cost categories.

8 **Q. Why are the Company's costs classified into these three categories?**

9 A. It is generally accepted within the industry that the costs in each of these
10 categories result from different cost causation factors and, hence, should be allocated
11 among the various customer classes by different methodologies which consider such cost
12 causation.

13 **Q. What are customer-related costs?**

14 A. Customer-related costs are the minimum costs necessary to just make
15 electric service available to the customer, regardless of the extent to which such service is
16 utilized. Examples of such costs include monthly meter reading, billing, postage,
17 customer accounting and customer service expenses, as well as a portion of the costs
18 associated with the required investment in a meter, the service line, the transformer and
19 other distribution system facilities. The customer components of the distribution system
20 are those costs necessary to simply make service available to a customer, without the
21 consideration of the amount of the customer's electrical use. The January 1992 edition of
22 the Electric Utility Cost Allocation Manual, published by the National Association of
23 Regulatory Utility Commissioners (“NARUC”), references both customer-related and

1 demand-related cost components for all distribution plant and operating expense accounts
2 other than for substations and street lighting plant accounts.

3 **Q. What are energy-related costs?**

4 A. Energy-related costs are those costs related directly to the customer's
5 consumption of electrical energy (kilowatt-hours) and consist primarily of fuel, fuel
6 handling, interchange power costs, and a portion of production plant maintenance
7 expenses.

8 **Q. What are demand-related costs, which are the third category of costs
9 to which you referred?**

10 A. Demand-related costs are rate base investment and related operating
11 expenses associated with the facilities necessary to supply a customer's service
12 requirements during periods of maximum, or peak, levels of power consumption each
13 month. During such peak periods, this usage is expressed in terms of the customer's
14 maximum power consumption, commonly referred to as kilowatts of demand. As so
15 defined, demand-related costs include those costs in excess of the aforementioned
16 customer and energy-related costs. The major portion of demand-related costs consists of
17 generation and transmission plant and the non-customer-related portion of distribution
18 plant.

19 **Q. Was there an additional category of cost that was examined in this
20 analysis?**

21 A. Yes, as discussed in Mr. Warwick's testimony, costs associated with the
22 Company's energy efficiency programs were categorized by affected (i.e., non-lighting
23 and non-Large Transmission Service) customer class.

1 **C. Cost Allocations**

2 **Q. After the Company's costs are categorized into one of the three major**
3 **classifications, how are they allocated to the various rate classes?**

4 A. Customer-related costs are normally allocated on the basis of the number
5 of customers associated with each rate class. In some instances involving non-residential
6 customer multiple metering installations, weighting factors may also be used. In
7 addition, where specific costs can be identified as being attributable to one or more
8 specific customer classes, such as credit and collection expenses, a direct assignment of
9 such costs will be made.

10 Energy-related costs are allocated to the customer classes on the basis of their
11 respective energy (kilowatt-hour) requirements at the generation level of the Company's
12 system, which includes applicable system energy losses. The use of this common point
13 on the Company's system to allocate such costs ensures that each customer class will be
14 assigned the appropriate portion of the Company's total incurred variable fuel and
15 purchased power costs.

16 Demand-related distribution costs are allocated to customer classes using one or
17 more allocation factors based upon customer class coincident, class non-coincident or
18 individual customer non-coincident kilowatt demands. Demand-related transmission
19 costs are allocated to customer classes on a 12 coincident peak ("CP") basis, as that
20 methodology is consistent with the method utilized to assign cost responsibility of the
21 demands of the Ameren operating companies and all of the other utilities participating in
22 the Midwest Independent Transmission System Operator, Inc. ("MISO"), per the MISO's
23 Attachment O Rate Formulae in the Open Access Transmission, Energy and Operating

1 Reserve Markets Tariff on file at the FERC. Demand-related production costs are
2 allocated on the basis of the Average & Excess (“A&E”) Demand Method referenced in
3 the NARUC cost allocation manual. As not all customers have demand meters, customer
4 class and individual customer kilowatt demand data is obtained from the Company's
5 ongoing load research program.

6 **Q. As generation (production) plant consists of more than half of the**
7 **Company's total plant investment, please summarize the most common cost**
8 **allocation methodologies employed within the electric utility industry for the**
9 **allocation of generation plant.**

10 A. The most common and generally accepted methodologies used for the
11 allocation of generation plant can be grouped into the following three categories:

12 Peak Responsibility – Costs are allocated on the basis of the relative customer
13 class demands at the time of occurrence of the company's system peak during the
14 period of study (referred to as the "coincident peak" or "CP" method). One or
15 more system peak hours, or a number of monthly or seasonal system peaks, are
16 normally used in applying the CP methodology.

17 Non-Coincident Peak – Costs are allocated on the basis of the maximum peak
18 demand of each customer class at any time during the study period, without
19 regard to the time of occurrence or magnitude of the company's coincident system
20 peaks (referred to as the "NCP" method). As with the CP method, the NCP
21 methodology can employ one or more customer class peaks in its application.

22 Average and Excess - Costs are allocated based upon a weighting of average class
23 demand throughout the year (kilowatt-hours ÷ 8,760 hours) and class "excess"

1 demand(s). The excess demand(s) used in this determination are the class NCP
2 demand(s) in excess of the average class demand during the study period. As
3 with the CP and NCP methodologies, this method can also employ the use of one
4 or more customer class NCP demands to determine class excess demands.
5 Average class demands are weighted by the Company's annual system load factor
6 ("LF") ($LF = \text{average demand} \div \text{peak demand}$) and excess class demands are
7 weighted by the complement of the load factor ($1.0 - LF$) in the development of
8 cost allocation factors using this methodology.

9 **Q. Which cost allocation methodology is the Company using for**
10 **production plant in its class cost of service study in this case?**

11 A. The Company is utilizing the 4 NCP version of the Average and Excess
12 ("A&E") demand methodology for allocating production plant in this case.

13 **Q. From a generation perspective, what were the considerations**
14 **associated with the Company's election to utilize the A&E demand allocation**
15 **methodology for production plant in this case?**

16 A. Two major factors associated with generation capacity planning prompted
17 the use of the A&E demand cost allocation methodology. Generally, system peak
18 demands and, to a somewhat lesser extent, excess customer demands, are the motivating
19 factors which influence the amount of capacity the Company must add to its generation
20 system to provide for its customers' maximum demands. However, the type of capacity
21 (base, intermediate or peaking) which the Company must add is not dictated by
22 maximum customer demand alone, but also by the annual energy, or kilowatt-hours,
23 which will be required to be generated by such capacity, i.e., the generation unit's

1 utilization factor. A cost allocation methodology that gives weight to both a) class peak
2 demands and b) class energy consumption (average demands) is required to properly
3 address both of the above considerations associated with capacity planning. The A&E
4 methodology gives weight to both of these considerations by its inclusion of both average
5 class demands, which are kilowatt-hours divided by total hours in the year (8,760) and
6 the excess NCP demands of each class. As indicated earlier, the Company's A&E cost
7 allocation study used both the 4 NCP and average class demands in the determination of
8 class excess demands.

9 **Q. Is there also quantitative support for the Company's selection of the**
10 **4 NCP version of the A&E demand allocation methodology for production plant?**

11 A. Yes. The 4 NCP version of the A&E methodology, which uses the four
12 maximum non-coincident monthly peak demands for each customer class during the test
13 year, was selected due to the fact that 16 of the 20 maximum 4 NCP monthly demands
14 for the Company's major (i.e., non-lighting) customer classes occurred during the
15 Company's summer peak demand months of June-September. The use of the 4 NCP
16 demand option, rather than a lesser number of monthly NCP demands, also prevents the
17 demand allocator for any customer class from being unduly influenced by any extreme
18 demand in a given month.

19 **Q. Is there any additional support for the Company's selection of the**
20 **4 NCP version of the A&E demand allocation methodology for production plant?**

21 A. Yes. The Commission's order in the Company's most recently
22 adjudicated electric rate case (Case No. ER-2010-0036) found that the Company's A&E
23 method was the most reliable of the submitted methods.

1 **Q. After the determination of customer, energy and demand allocation**
2 **factors for the various components of the Company's costs, what was the next step**
3 **in the completion of the Company's class cost of service study?**

4 A. The next step was to apply the allocation factors developed for each class
5 to each component of rate base investment and each of the elements of expense specified
6 in the jurisdictional cost of service study. The aggregation of such cost allocations
7 indicates the total annual costs, or annual revenue requirement, at equalized rates of
8 return associated with serving a particular customer class. The operating revenues of
9 each customer class minus its total operating expenses provide the resulting net operating
10 income for each class. This net operating income divided by the rate base allocated to
11 each class will indicate the percentage rate of return being earned by the Company from a
12 particular customer class. This application of allocation factors to Missouri electrical
13 jurisdictional costs, the aggregation of the total annual cost to each of the customer
14 classes and a summary of the results of the Company's class cost of service study are
15 described in detail in Mr. Warwick's direct testimony.

16 **Q. Earlier you mentioned the categorization of energy efficiency related**
17 **costs. How were these costs allocated to the affected customer classes?**

18 A. As discussed in the testimony of Mr. Warwick, the program costs were
19 directly assigned to the benefiting class and associated administrative and general
20 expenses were allocated based on each class' proportionate responsibility of total energy
21 efficiency program costs.

1 **D. Study Results**

2 **Q. Referring now to the results of the Company's class cost of service**
3 **study performed by Mr. Warwick in this case, please identify Schedule WLC-E5.**

4 A. Schedule WLC-E5 (which is the same as Mr. Warwick's Schedule
5 WMW-E1) summarizes the results of the Company's class cost of service study,
6 indicating the rate of return on rate base currently being earned on the service being
7 provided to the Company's major retail customer classes. As indicated earlier, the basic
8 starting point for this study was the Missouri jurisdictional cost of service study.

9 **Q. What general conclusions can be drawn from the information**
10 **contained in Schedule WLC-E5?**

11 A. The Residential, Large Transmission and Lighting Service classes are
12 providing a below average rate of return, while all other classes are providing above
13 average rates of return. Overall, as is suggested by the filing of this case, the Company is
14 earning an inadequate return on its rate base.

15 **E. Class Revenue Proposals**

16 **Q. Please identify Schedule WLC-E6.**

17 A. Schedule WLC-E6 summarizes the class revenue requirements necessary
18 to give the Company an opportunity, based upon test year figures with the pro forma
19 adjustments made by Mr. Weiss, to achieve an equal rate of return from each of its
20 customer classes. This information was developed from the cost of service data
21 contained in Schedules WMW-E1 and WMW-E2 of Mr. Warwick's direct testimony, and
22 is based upon the Company's proposed level of Missouri retail revenues.

1 **Q. Why are the equal rates of return for all customer classes an**
2 **appropriate starting point when designing electric utility rates?**

3 A. There are several reasons why equal class rates of return are an
4 appropriate starting point in the consideration of rate design. First and foremost is the
5 consideration of equity and fairness to all electric customers. Purely from a cost
6 perspective and ignoring all other factors, to overcharge one customer class in order to
7 subsidize another class is not supportable.

8 A second important consideration in support of equal class rates of return is the
9 goal of encouraging cost effective utilization of electricity by customers. To make
10 appropriate decisions regarding the most efficient and effective use of electricity, as well
11 as the acquisition of electrical consuming equipment, customers require correct and
12 appropriate price signals from the Company's electric rates.

13 A third consideration is that of competition. Cost-based electric rates permit the
14 Company to compete effectively with alternative fuels, co-generation and other electric
15 utilities for new commercial and industrial customers.

16 **Q. Once the annual cost-based revenue requirements are developed by**
17 **this process for all of the Company's customer classes, would the design of specific**
18 **rates for each class be the next and final step in the overall rate development**
19 **process?**

20 A. If one was to base class rates solely on class cost of service and ignore
21 other relevant factors, the response would be yes. However, the results of Mr. Warwick's
22 study produced the following revenue increases by customer class:

1

Customer Class	Cost of Service Increase
Residential Service	19%
Small General Service	1%
Large General and Small Primary Service	0.5%
Large Primary Service	8%
Large Transmission Service	14%
Lighting Service	36%

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3 **Q. Is the Company proposing that these cost based class revenue**
4 **requirements be utilized in developing class rates in the case?**

5 A. No, the Company is proposing a departure from class revenue
6 requirements or rate design being established solely on the basis of equal class rates of
7 return as shown in its class cost of service study.

8 **Q. Why is the Company proposing to vary from the cost based revenue**
9 **requirements?**

10 A. The Company recognizes that factors other than cost of service are
11 relevant to determining class revenue requirements. These factors may include, but are
12 not limited to, revenue stability, rate stability, effectiveness in yielding total revenue
13 requirements, public acceptance, and value of service.

14 **Q. What is the Company's proposal for allocating the revenue increase**
15 **requested in this case?**

1 A. The Company is proposing to allocate the revenue increase requested in
2 this case on an equal percentage of present revenue basis.

3 **Q. Please explain the Company’s proposal to allocate the revenue**
4 **increase in this case on an equal percentage or across-the-board basis rather than**
5 **based solely on class cost of service study results.**

6 A. While cost based rates are an important starting point in developing class
7 revenue targets and rate design, the aforementioned other factors of revenue stability, rate
8 stability, effectiveness in yielding total revenue requirements, public acceptance, and
9 value of service should be considered when determining class revenue requirements and
10 designing rates. Considering the prolonged nature of the country’s challenging economic
11 conditions, these other factors take on more importance. Judgmental weighting of all
12 these factors drove the Company’s equal percentage of increase proposal.

13 **Q. Did the Commission’s order in Case No. ER-2010-0036 contain any**
14 **language to support establishing class revenue requirements based on factors other**
15 **than class cost of service results?**

16 A. Yes. At pages 87-88 the order states, “However, the Commission is not
17 required to precisely set rates to match the indicated class cost of service. Instead, the
18 Commission has a great deal of discretion to set just and reasonable rates, and can take
19 into account other factors, such as public acceptance, rate stability and revenue stability
20 in setting rates.”

1 (2) Residential Rate Design. The Customer Charge was the initial rate
2 component developed. Mr. Warwick's class cost of service study produced a
3 customer charge of approximately \$18 per month. Although the existing
4 customer charge of \$8.00 per month is only 75¢ greater than its level of \$7.25 per
5 month in March 2000, the Company has limited this charge to \$10.00 in its
6 proposed Residential Rate. The remaining energy charges of the Residential Rate
7 were increased to achieve the annual revenue target or across-the-board increase
8 less the unbundled energy efficiency revenue requirement for this class.

9 (3) Small General Service Rate Design. The Customer Charge was
10 the initial rate component developed. Mr. Warwick's class cost of service study
11 produced a weighted customer charge of approximately \$21 per month for
12 customers in this class. The current level is \$9.28 per month for single phase
13 service and \$18.26 for three phase service. The Company has limited this charge
14 to \$11 for single phase service and \$22 for three phase service in its proposed
15 Small General Service Rate. The remaining energy charges of the Small General
16 Service Rate were increased to achieve the annual revenue target or across-the-
17 board increase less the unbundled energy efficiency revenue requirement for this
18 class.

19 (4) Retention of Certain Prior Uniform Features of the Company's non
20 -Residential, Commercial and Industrial Customer classes. The Company is
21 proposing to retain the following rate design features that are currently in effect.
22 Remaining rate designs for these Service Classifications will be discussed later.

1 (a) The customer charges on the SPS, LPS, and LTS rate schedules are
2 proposed to remain the same.

3 (b) The rates (\$ per kW) for Rider B voltage credits are proposed to
4 remain the same under all applicable rate schedules.

5 (c) The rate (\$ per billed kVar) associated with the Reactive Charge is
6 proposed to remain the same under all applicable rate schedules.

7 (d) The rate (\$ per month) associated with the Time-of-Day meter
8 charge is proposed to remain the same under all applicable rate schedules.

9 (5) Large General Service and Small Primary Service Rate Design.
10 The demand and energy charges on the LGS and SPS rate schedules were
11 increased uniformly to achieve the annual revenue requirement of these classes
12 less the unbundled energy efficiency revenue requirement after uniformity
13 adjustments were made, as described in (4) above.

14 (6) Large Primary Service Rate Design. The demand and energy
15 charges on the LPS rate schedule were increased uniformly to achieve the annual
16 revenue requirement less the unbundled energy efficiency revenue requirement of
17 this class after uniformity adjustments were made, as described in (4) above.

18 (7) Large Transmission Service Rate Design. The demand and energy
19 charges on the LTS rate schedule were increased uniformly to achieve the annual
20 revenue requirement of this class after uniformity adjustments were made, as
21 described in (4) above.

22 (8) Lighting Service – The Company has three active lighting service
23 classifications: 1) Street & Outdoor Area Lighting – Company-Owned 5(M);

1 2) Street and Outdoor Area Lighting – Customer-Owned 6(M); and 3) Municipal
2 Street Lighting – Incandescent 7(M). The Company is proposing to withdraw
3 tariffs associated with Service Classification No. 8(M) – Private Ornamental
4 Street Lighting – Rate of Limited Application, as there are no customers currently
5 receiving service under this rate.

6 Mr. Warwick’s class cost of service study combined the Lighting Service
7 classification, excluding Service Classification No. 8(M), and, as noted above, produced
8 a cost-based increase of 36%. However, as mentioned above, the Company is proposing
9 an across-the-board increase (i.e., 10.8%) for its major customer classes in this case. As
10 described in AmerenUE witness Philip B. Difani’s direct testimony, the next step in the
11 development of Lighting rates was to refine Mr. Warwick’s study to properly apportion
12 the class cost of service based increase for the Lighting Service among the 5(M), 6(M),
13 and 7(M) service classifications. With regard to 5(M) and 6(M), Mr. Difani utilized
14 current cost data as a proxy to properly allocate the class cost of service based increase
15 and then to align rates between these classifications. It should be noted that, because the
16 7(M) classification has very limited use, all rates therein were simply increased by
17 10.8%. Mr. Difani’s “current cost” analysis, as adjusted to achieve the cost based
18 increase of 36%, produced an increase of 15% for 5(M) and 216% for 6(M). As the
19 proportionality of the 6(M) “cost based” rate increase was materially higher than the
20 5(M) increase, the Company is proposing to mitigate this result by limiting the 6(M)
21 increase to 20%. Due consideration of other relevant factors such as public acceptance,
22 value of service, revenue stability, rate stability, etc. support this mitigation approach.

1 Said mitigation results in a 9.7% increase for the 5(M) classification in order to achieve
2 the aforementioned 10.8% overall Lighting Service increase.

3 **Q. Proposed monthly customer charges for both the Residential and**
4 **Small General Service Classifications reflect percentage increases larger than the**
5 **across-the-board percentage increase level proposed for these classes. Please**
6 **explain.**

7 A. First, it should be noted that the combination of proposed customer and
8 energy charges for each of these respective classes produces the overall percentage
9 increase being requested for each of the classes in this case (i.e. 10.8%). Second, as
10 discussed in the testimony of Company witness William R. Davis, AmerenUE has
11 embarked on an energy efficiency and demand response effort to give customers more
12 control over their energy usage and to lower their bills via reduced consumption.
13 Therefore, the Company is proposing larger increases in customer charges and
14 corresponding reductions in the percentage of revenue derived from volumetric or
15 consumption charges for these classes. This proposal reflects cost causation principles
16 (i.e., moves customer charges closer to class cost of service study results), helps to
17 mitigate the negative financial impact, if any, on the Company associated with decreased
18 volumetric or energy use, and, at the same time, does not discourage energy efficiency.
19 Shifting more of the class' revenue requirement to monthly customer charges helps to
20 remove some of the financial disincentive to embark on an energy efficiency campaign,
21 and affords the Company a more reasonable opportunity to earn a fair rate of return
22 regardless of weather conditions. Excluding the impacts of the Low Income Pilot
23 Program Charges, approximately 91% and 93%, respectively, of the present test year

1 revenues of these classes are collected via current energy or volumetric charges with the
2 remaining 9% and 7%, respectively, being collected via customer charges. The proposed
3 customer charges would increase the customer charge contribution to total revenues for
4 the Residential and Small General Service classes to 10% and 7%, respectively.

5 **V. STUDY ADDRESSING ELIMINATION OF RESIDENTIAL**
6 **DECLINING BLOCK RATE**
7

8 **Q. Paragraph 12b. (page 7) of the First Nonunanimous Stipulation And**
9 **Agreement in the Company’s most recent rate case (Case No. ER-2010-0036) states**
10 **the following: “prior to its next general rate case, [the Company shall] conduct a**
11 **study addressing the elimination of declining block rates for residential service in a**
12 **revenue neutral manner, and will file the results of this study in its next general**
13 **electric rate case.” Has the Company completed this study?**

14 **A.** Yes, it has. I would note that the Company’s existing residential rate
15 design contains a declining block for the winter billing season only. Therefore, the
16 Company performed this analysis and its impact on accounts coded as residential electric
17 space heating. This group of approximately 217,000 residential customers was chosen as
18 their higher than average winter usage is more likely to be negatively impacted by a
19 revenue neutral elimination of the declining block rate. Schedule WLC-E8 depicts the
20 results of the analysis. As shown on Schedule WLC-E8-1, the overall average increase
21 for the residential class is 10.8% under the proposed across-the-board approach, while the
22 increase would average 15.8% during the winter months for residential customers with
23 electric space heating if the declining block rate was eliminated with revenue neutrality.
24 Additionally, as shown on Schedule WLC-E8-2, the monthly dollar impact on residential
25 space heating bills would vary significantly from retention of the declining block rate,

1 depending on kWh usage, versus a revenue neutral elimination of the declining block
2 rate. If the declining block rate design were eliminated, monthly winter bill amounts
3 would decrease by \$1.78 per month at 700 kWh, increase by \$53.85 per month at 4,000
4 kWh, and increase by \$157.05 per month at 10,000 kWh from the current rate levels. On
5 the other hand, the Company's proposed rate design, which retains the declining block,
6 would result in winter monthly bill increases of \$6.20, \$17.88, and \$38.88 respectively, at
7 these same usage levels.

8 **Q. Is the Company proposing to eliminate the declining block of its**
9 **winter residential rate?**

10 A. No, as discussed above, the elimination of this block would have a
11 material bill impact beyond the magnitude of the across-the-board increase recommended
12 by the Company in this case. Additionally, the Company's declining block rate has been
13 in place for decades and is warranted because winter space heating makes more efficient
14 use of existing production and transmission capacity installed to meet the higher summer
15 demands for electricity. Also, from an energy perspective, additional winter demand can
16 be served by the Company at a variable cost lower than its average running costs of
17 generation.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes, it does.

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

In the Matter of Union Electric Company)
d/b/a AmerenUE for Authority to File)
Tariffs Increasing Rates for Electric) Case No. ER-2011-0028
Service Provided to Customers in the)
Company's Missouri Service Area.)

AFFIDAVIT OF WILBON L. COOPER

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Wilbon L. Cooper, being first duly sworn on his oath, states:

1. My name is Wilbon L. Cooper. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a AmerenUE as Manager, Rates and Tariffs.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of 26 pages, Schedules WLC-E1 through WLC-E8, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.



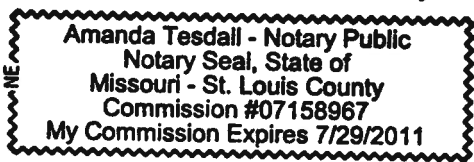
Wilbon L. Cooper

Subscribed and sworn to before me this 3 day of September, 2010.



Notary Public

My commission expires:



APPLYING TO MISSOURI SERVICE AREA

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*Indicates Change.

DATE OF ISSUE September 3, 2010 DATE EFFECTIVE October 3, 2010

ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
NAME OF OFFICER TITLE ADDRESS

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 39th Revised SHEET NO. 28
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 38th Revised SHEET NO. 28

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 1(M)
RESIDENTIAL SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	\$10.00
Low-Income Pilot Program Charge - per month	\$0.03
Energy Charge - per kWh	10.47¢
Energy Efficiency Program Charge - per kWh	0.11¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	\$10.00
Low-Income Pilot Program Charge - per month	\$0.03
Energy Charge - per kWh	
First 750 kWh	7.47¢
Over 750 kWh	4.96¢
Energy Efficiency Program Charge - per kWh	0.06¢

Optional Time-of-Day Rate

Customer Charge - per month	\$20.00
Low-Income Pilot Program Charge - per month	\$ 0.03
Energy Charge - per kWh (1)	
Summer (June-September billing periods)	
All On Peak kWh	15.23¢
All Off Peak kWh	6.24¢
Energy Efficiency Program Charge - per kWh	0.11¢
Winter (October-May billing periods)	
All On Peak kWh	8.99¢
All Off Peak kWh	4.44¢
Energy Efficiency Program Charge - per kWh	0.06¢

(1) On-peak and Off-peak hours applicable herein shall be as specified in Rider I, paragraph A.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

Payments. Bills are due and payable within ten (10) days from date of bill and become delinquent after twenty-one (21) days from date of bill.

Term of Use. Initial period one (1) year, terminable thereafter on three (3) days' notice.

Tax Adjustment. Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

* Indicates Change.

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 27th Revised SHEET NO. 32
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 26th Revised SHEET NO. 32

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 2(M)
SMALL GENERAL SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	
Single Phase Service	\$11.00
Three Phase Service	\$22.00
Low-Income Pilot Program Charge - per month	\$0.05
Energy Charge - per kWh	10.11¢
Energy Efficiency Program Charge - per kWh (3)	0.03¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	
Single Phase Service	\$11.00
Three Phase Service	\$22.00
Low-Income Pilot Program Charge - per month	\$0.05
Energy Charge - per kWh	
Base Use	7.54¢
Seasonal Use(1)	4.36¢
Energy Efficiency Program Charge - per kWh (3)	0.02¢

Optional Time-of-Day Rate

Customer Charge - per month	
Single Phase Service	\$20.45
Three Phase Service	\$40.88
Low-Income Pilot Program Charge - per month	\$0.05
Energy Charge - per kWh (2)	
Summer (June-September billing periods)	
All On Peak kWh	15.02¢
All Off Peak kWh	6.11¢
Energy Efficiency Program Charge - per kWh (3)	0.03¢
Winter (October-May billing periods)	
All On Peak kWh	9.88¢
All Off Peak kWh	4.53¢
Energy Efficiency Program Charge - per kWh (3)	0.02¢

- (1) The winter seasonal energy use shall be all kWh in excess of 1,000 kWh per month and in excess of the lesser of a) the kWh use during the preceding May billing period, or b) October billing period, or c) the maximum monthly kWh use during any preceding summer month.
- (2) On-peak and Off-peak hours applicable herein shall be as specified in Rider I, paragraph A.
- (3) Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

*Indicates Change.

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APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 3(M)

LARGE GENERAL SERVICE RATE

* Rate Based on Monthly Meter Readings

<u>Summer Rate</u>	(Applicable during 4 monthly billing periods of June through September)	
Customer Charge - per month		\$87.24
Low-Income Pilot Program Charge - per month		\$ 0.50
Energy Charge - per kWh		
First 150 kWh per kW of Billing Demand		9.77¢
Next 200 kWh per kW of Billing Demand		7.35¢
All Over 350 kWh per kW of Billing Demand		4.95¢
Demand Charge - per kW of Total Billing Demand		\$ 4.56
Energy Efficiency Charge - per kWh (1)		0.07¢

<u>Winter Rate</u>	(Applicable during 8 monthly billing periods of October through May)	
Customer Charge - per month		\$87.24
Low-Income Pilot Program Charge - per month		\$ 0.50
Base Energy Charge - per kWh		
First 150 kWh per kW of Base Demand		6.15¢
Next 200 kWh per kW of Base Demand		4.56¢
All Over 350 kWh per kW of Base Demand		3.59¢
Seasonal Energy Charge - Seasonal kWh		3.59¢
Demand Charge - per kW of Total Billing Demand		\$ 1.69
Energy Efficiency Charge - per kWh (1)		0.05¢

(1) Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments

Additional Customer Charge - per Month	\$18.66 per month	
Energy Adjustment - per kWh	On-Peak	Off-Peak
	<u>Hours (2)</u>	<u>Hours (2)</u>
Summer kWh (June-September billing periods)	+1.15¢	-0.65¢
Winter kWh (October-May billing periods)	+0.35¢	-0.20¢

(2) On-peak and off-peak hours applicable herein shall be as specified in Rider I, paragraph A.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

*Indicates Change.

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 37th Revised SHEET NO. 37
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 36th Revised SHEET NO. 37

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 4 (M)

SMALL PRIMARY SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$0.50
Energy Charge - per kWh	
First 150 kWh per kW of Billing Demand	9.42¢
Next 200 kWh per kW of Billing Demand	7.09¢
All Over 350 kWh per kW of Billing Demand	4.76¢
Demand Charge - per kW of Total Billing Demand	\$3.77
Reactive Charge - per kVar	33.00¢
Energy Efficiency Charge - per kWh (1)	0.08¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$0.50
Base Energy Charge - per kWh	
First 150 kWh per kW of Base Demand	5.93¢
Next 200 kWh per kW of Base Demand	4.41¢
All Over 350 kWh per kW of Base Demand	3.45¢
Seasonal Energy Charge - Seasonal kWh	3.45¢
Demand Charge - per kW of Total Billing Demand	\$1.37
Reactive Charge - per kVar	33.00¢
Energy Efficiency Charge - per kWh (1)	0.06¢

(1) Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments

Additional Customer Charge - per Month	\$18.66 per month	
Energy Adjustment - per kWh	<u>On-Peak</u>	<u>Off-Peak</u>
	<u>Hours (2)</u>	<u>Hours (2)</u>
Summer kWh (June-September billing periods)	+0.84¢	-0.47¢
Winter kWh (October-May billing periods)	+0.32¢	-0.16¢

(2) On-peak and Off-peak hours applicable herein shall be as specified within this service classification.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

*Indicates Change.

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C.SCHEDULE NO. 5 28th Revised SHEET NO. 39
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 27th Revised SHEET NO. 39

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED

*Rate per Unit per Month
Lamp and Fixture

A. Standard horizontal burning, enclosed luminaire on existing wood pole:

<u>High Pressure Sodium</u>		<u>Mercury Vapor (1)</u>	
<u>Lumens</u>	<u>Rate</u>	<u>Lumens</u>	<u>Rate</u>
9,500	\$10.50	6,800	\$10.50
25,500	\$15.17	20,000	\$15.17
50,000	\$27.03	54,000	\$27.03
		108,000	\$54.09

B. Standard side mounted, hood with open bottom glassware on existing wood pole:

<u>High Pressure Sodium</u>		<u>Mercury Vapor (1)</u>	
<u>Lumens</u>	<u>Rate</u>	<u>Lumens</u>	<u>Rate</u>
5,800	\$8.49	3,300	\$8.49
9,500	\$9.29	6,800	\$9.29

C. Standard post-top luminaire including standard 17-foot post:

<u>High Pressure Sodium</u>		<u>Mercury Vapor (1)</u>	
<u>Lumens</u>	<u>Rate</u>	<u>Lumens</u>	<u>Rate</u>
9,500	\$19.44	3,300	\$18.38
		6,800	\$19.44

D. Pole-mounted, direction flood luminaire; limited to installations accessible to Company basket truck:

<u>High Pressure Sodium</u>		<u>Metal Halide</u>		<u>Mercury Vapor (1)</u>	
<u>Lumens</u>	<u>Rate</u>	<u>Lumens</u>	<u>Rate</u>	<u>Lumens</u>	<u>Rate</u>
25,500	\$19.25	34,000	\$19.25	20,000	\$19.25
50,000	\$30.44	100,000	\$60.86	54,000	\$30.44

(1) Mercury Vapor lamps and fixtures are limited to customers served under contracts initiated prior to September 27, 1988. Company will continue to maintain these lamps and fixtures so long as parts are economically available.

*Indicates Change.

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MO.P.S.C. SCHEDULE NO. 5 26th Revised SHEET NO. 40
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 25th Revised SHEET NO. 40

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED (Cont'd.)

- * E. All poles and cable, where required to provide lighting service:
 - 1. The installation of all standard poles and cables shall be paid for in advance by customer, with all subsequent replacements of said facilities provided by Company.
- * F. Incandescent lamps provided under contracts initiated prior to September 30, 1963, which facilities will not be maintained by Company after June 30, 1981:

<u>Lamp and Fixture</u>	<u>Per Unit Monthly Rate</u>
1,000 Lumens	\$10.06
2,500 "	13.58
4,000 "	15.67
6,000 "	17.39
10,000 "	23.61

*Indicates Change

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APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 5(M)
STREET AND OUTDOOR AREA LIGHTING - COMPANY-OWNED (Cont'd.)

*G. Former Subsidiary Company lighting units provided under contracts initiated prior to April 9, 1986, which facilities will only be maintained by Company so long as parts are available in Company's present stock:

<u>Lamp and Fixture</u>	<u>*Per Unit Monthly Rate</u>
11,000 Lumens, Mercury Vapor, Post-Top	\$19.44
11,000 Lumens, Mercury Vapor, Open Bottom	9.29
11,000 Lumens, Mercury Vapor, Horizontal Enclosed	10.50
42,000 Lumens, Mercury Vapor, Horizontal Enclosed	27.07
16,000 Lumens, H.P. Sodium, Horizontal Enclosed	10.51
34,200 Lumens, H.P. Sodium, Directional(2)	19.25
140,000 Lumens, H.P. Sodium, Directional	60.86
20,000 Lumens, Metal Halide, Directional	19.28

(2) This lamp represents a mercury vapor fixture with H.P. Sodium lamp.

Term of Contract. Minimum term of three (3) years where only standard facilities are installed; ten (10) years where post-top luminaires are installed.

Discount for Franchised Municipal Customers. A 10% discount will be applied to bills rendered for lighting facilities served under the above rates and currently contracted for by municipalities with whom the Company has an ordinance granted electric franchise as of September 27, 1988. The above discount shall only apply for the duration of said franchise. Thereafter, the above discount shall apply only when the following two conditions are met: 1) any initial or subsequent ordinance granted electric franchise must be for a minimum term of twenty (20) years and 2) Company must have a contract for all lighting facilities for municipal lighting service provided by Company in effect.

Tax Adjustment. Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

*Indicates Change.

UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 17th Revised SHEET NO. 45
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 16th Revised SHEET NO. 45

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 6(M)
STREET AND OUTDOOR AREA LIGHTING - CUSTOMER-OWNED

*Monthly Rate For Metered Service

Customer Charge Per Meter \$6.20 per month
 Energy Charge 4.19¢ per kWh

*Rate Per Unit Per Month For Unmetered Service

Customer Charge per account \$6.20 per month

<u>H.P. Sodium</u>	<u>Energy & Maintenance (1)</u>	<u>Energy Only (2)</u>
9,500 Lumens, Standard	\$ 3.33	\$ 1.62
16,000 Lumens, Standard	N/A	2.75
25,500 Lumens, Standard	5.81	4.14
50,000 Lumens, Standard	8.38	6.49
<u>Metal Halide</u>		
5,500 Lumens, Standard	\$ 4.82	N/A
12,900 Lumens, Standard	5.77	N/A
<u>Mercury Vapor</u> <u>(3)</u>		
3,300 Lumens, Standard	\$ 3.34	\$ 1.72
6,800 Lumens, Standard	4.33	2.78
11,000 Lumens, Standard	5.87	3.96
20,000 Lumens, Standard	7.79	6.12
42,000 Lumens, Standard	N/A	10.19
54,000 Lumens, Standard	16.63	14.56

- * (1) Company will furnish electric energy, furnish and replace lamps, and adjust and replace control mechanisms, as required.
- (2) Limited to lamps served under contracts initiated prior to September 27, 1988.
- (3) Maintenance of lamps and fixtures limited to customers served under contracts prior to November 15, 1991.
N/A--Not Available.

Term of Contract. One (1) year, terminable thereafter on three (3) days' notice.

Discount For Franchised Municipal Customers. A 10% discount will be applied to bills rendered for lighting facilities served under the above rates and currently contracted for by municipalities with whom the Company has an ordinance granted electric franchise as of September 27, 1988. The above discount shall only apply for the duration of said franchise. Thereafter, the above discount shall apply only when the following two conditions are met: 1) any initial or subsequent ordinance granted electric franchise must be for a minimum term of twenty (20) years and 2) Company must have a contract for all lighting facilities for municipal lighting service provided by Company in effect.

*Indicates Change.

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MO.P.S.C. SCHEDULE NO. 5 27th Revised SHEET NO. 50
 CANCELLING MO.P.S.C. SCHEDULE NO. 5 26th Revised SHEET NO. 50

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 7 (M)
MUNICIPAL STREET LIGHTING - INCANDESCENT
RATE OF LIMITED APPLICATION

*Rate per Lamp per Month

	<u>Incandescent</u>				
	<u>1,000</u>	<u>2,500</u>	<u>4,000</u>	<u>6,000</u>	<u>10,000</u>
	<u>Lumen</u>	<u>Lumen</u>	<u>Lumen</u>	<u>Lumen</u>	<u>Lumen</u>
<u>Wood Pole Rates</u>	\$3.89	\$5.92	\$8.07	\$10.73	\$14.68

Ornamental Pole. Add \$6.38 per month per pole to above Wood Pole Rates.

* Customer-Owned Street Lighting Facilities. Where customer furnishes, installs and owns all street lighting facilities, service will be supplied as follows:

For Metered Service:

Customer Charge per Meter \$13.34 per month

1) Secondary Service 3.89¢ per kWh

2) Primary Service - Rider C shall be applied.

Customer shall install suitable switching and protective equipment, meter loop, space and mounting facilities for Company metering devices.

Tax Adjustment. Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

Payments. Bills are due and payable within ten (10) days from date of bill.

Term of Contract. Ten (10) years. Customer, if not legally authorized to contract for all of an initial or succeeding ten-year contract term at one time, may sign an agreement for the maximum period for which it is legally authorized to contract, and said agreement will continue in force thereafter for successive one-year periods unless terminated by either party by written notice given not less than sixty (60) days prior to any annual termination date.

*Indicates Change.

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MO.P.S.C. SCHEDULE NO. 5

20th Revised

SHEET NO. 55

CANCELLING MO.P.S.C. SCHEDULE NO. 5

19th Revised

SHEET NO. 55

APPLYING TO

MISSOURI SERVICE AREA

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5

1st Revised

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CANCELLING MO.P.S.C. SCHEDULE NO. 5

Original

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CANCELLING MO.P.S.C. SCHEDULE NO. 5

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CANCELLING MO.P.S.C. SCHEDULE NO. 5

5th Revised

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SHEET NO. 58

CANCELLING MO.P.S.C. SCHEDULE NO. 5

19th Revised

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APPLYING TO

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UNION ELECTRIC COMPANY

ELECTRIC SERVICE

MO.P.S.C. SCHEDULE NO. 5 14th Revised SHEET NO. 67.1
 CANCELLING MO.P.S.C.SCHEDULE NO. 5 13th Revised SHEET NO. 67.1

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 11(M)
LARGE PRIMARY SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during 4 monthly billing periods of June through September)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$50.00
Energy Charge - per kWh	3.21¢
Demand Charge - per kW of Billing Demand	\$19.12
Reactive Charge - per kVar	33.00¢
Energy Efficiency Charge - per kWh (1)	0.02¢

Winter Rate (Applicable during 8 monthly billing periods of October through May)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$50.00
Energy Charge - per kWh	2.83¢
Demand Charge - per kW of Billing Demand	\$8.68
Reactive Charge - per kVar	33.00¢
Energy Efficiency Charge - per kWh (1)	0.01¢

(1) Not applicable to customers that have satisfied the opt-out provisions of Section 393.1075, RSMo.

Optional Time-of-Day Adjustments

Additional Customer Charge - per month	\$18.66 per month	
Energy Adjustment - per kWh	On-Peak	Off-Peak
	<u>Hours(2)</u>	<u>Hours(2)</u>
Summer kWh(June-September billing periods)	+0.62¢	-0.34¢
Winter kWh(October-May billing periods)	+0.29¢	-0.14¢

(2) On-peak and off-peak hours applicable herein shall be as specified within this service classification.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

Payments. Bills are due and payable within ten (10) days from date of bill and become delinquent after twenty-one (21) days from date of bill.

Term of Use. One (1) year, terminable thereafter on three (3) days' notice.

Tax Adjustment. Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

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APPLYING TO MISSOURI SERVICE AREA

MISCELLANEOUS CHARGES

A. Reconnection Charges per Connection Point

Sheet No. 106, Par. B-3 (Annually Recurring Service) \$30.00
 Sheet No. 184, Par. I (Reconnection of Service) \$30.00

*B. Supplementary Service Minimum Monthly Charges

Sheet No. 103, Par. C-3

Charges applicable during 4 monthly
billing periods of June through September Primary Service Rate

Customer Charge per month, plus	\$286.72
Low-Income Pilot Program Charge - per month	\$50.00
All kW @	\$19.12

Charges applicable during 8 monthly
billing periods of October through May Primary Service Rate

Customer Charge per month, plus	\$286.72
Low-Income Pilot Program Charge - per month	\$50.00
All kW @	\$8.68

C. Service Call Charge. Customer's reporting service problems may be charged a \$50.00 fee for a service call, if it is determined the problem is within the customer's electrical system.

Tax Adjustment. Any license, franchise, gross receipts, occupation or similar charge or tax levied by any taxing authority on the amounts billed hereunder will be so designated and added as a separate item to bills rendered to customers under the jurisdiction of the taxing authority.

*Indicates Change.

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 12(M)
LARGE TRANSMISSION SERVICE RATE

* Rate Based on Monthly Meter Readings

Summer Rate (Applicable during four (4) monthly billing periods of June through September)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$1,500.00
Demand Charge - per kW of Billing Demand	\$14.14
Energy Charge - per kWh	2.682¢
Reactive Charge - per kVar	33.000¢

Winter Rate (Applicable during eight (8) monthly billing periods of October through May)

Customer Charge - per month	\$286.72
Low-Income Pilot Program Charge - per month	\$1,500.00
Demand Charge - per kW of Billing Demand	\$5.40
Energy Charge - per kWh	2.362¢
Reactive Charge - per kVar	33.000¢

Optional Time-of-Day Adjustments

Additional Customer Charge - per month	\$18.66	
Energy Adjustment - per kWh	<u>On-Peak</u>	<u>Off-Peak</u>
	Hours(1)	Hours(1)
Summer kWh (June-September Billing Periods)	+0.54¢	-0.31¢
Winter kWh (October-May Billing Periods)	+0.24¢	-0.13¢

(1) On-peak and off-peak hours applicable herein shall be as specified within this service classification.

Fuel and Purchased Power Adjustment (Rider FAC). Applicable to all metered kilowatt-hours (kWh) of energy.

* Indicates Change.

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CANCELLING MO. P.S.C. SCHEDULE NO. 5 3rd Revised SHEET NO. 68.1

APPLYING TO MISSOURI SERVICE AREA

SERVICE CLASSIFICATION NO. 12(M)
LARGE TRANSMISSION SERVICE RATE (Cont'd.)

* Energy Line Loss Rate. Compensation for Customer's energy line losses from use of the transmission system(s) outside Company's control area shall be in the form of energy solely supplied by Company to the transmission owner(s) and compensated by payment at a monthly rate of \$0.0362 per kWh after appropriate Rider C adjustment of meter readings.

1. Transmission Service Requirements. Company's obligation to provide service under this rate is conditioned upon receipt of approval from the appropriate Regional Transmission Organization ("RTO") to incorporate Customer's load within Company's Network Integration Transmission Service agreement without the obligation or requirement that Company construct, upgrade, or improve any existing or new transmission plant or facilities.

* Indicates Change

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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE

(Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)

APPLICABILITY

This rider is applicable to kilowatt-hours (kWh) of energy supplied to customers served by the Company under Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 5(M), 6(M), 7(M), 8(M), 11(M), and 12(M).

Costs passed through this Fuel and Purchased Power Adjustment Clause (FAC) reflect differences between actual fuel and purchased power costs, including transportation, net of Off-System Sales Revenues (OSSR) (i.e., Actual Net Fuel Costs) and Net Base Fuel Costs (factor NBFC, as defined below), calculated and recovered as provided for herein.

The Accumulation Periods and Recovery Periods are as set forth in the following table:

<u>Accumulation Period (AP)</u>	<u>Filing Date</u>	<u>Recovery Period (RP)</u>
February through May	By August 1	October through September
June through September	By December 1	February through January
October through January	By April 1	June through May

Accumulation Period (AP) means the historical calendar months during which fuel and purchased power costs, including transportation, net of OSSR for all kWh of energy supplied to Missouri retail customers are determined.

Recovery Period (RP) means the billing months as set forth in the above table during which the difference between the Actual Net Fuel Costs during an Accumulation Period and NBFC are applied to and recovered through retail customer billings on a per kWh basis, as adjusted for service voltage level.

The Company will make a Fuel and Purchased Power Adjustment (FPA) filing by each Filing Date. The new FPA rates for which the filing is made will be applicable starting with the Recovery Period that begins following the Filing Date. All FPA filings shall be accompanied by detailed workpapers supporting the filing in an electronic format with all formulas intact.

FPA DETERMINATION

Ninety five percent (95%) of the difference between Actual Net Fuel Costs and NBFC for all kWh of energy supplied to Missouri retail customers during the respective Accumulation Periods shall be reflected as an FPA_c credit or debit, stated as a separate line item on the customer's bill and will be calculated according to the following formulas.

For the FPA filing made by each Filing Date, the FPA_c rate, applicable starting with the Recovery Period following the applicable Filing Date, to recover fuel and purchased power costs, including transportation, net of OSSR, to the extent they vary from Net Base Fuel Costs (NBFC), as defined below, during the recently-completed Accumulation Period is calculated as:

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MO.P.S.C. SCHEDULE NO. 5 1st Revised SHEET NO. 98.9CANCELLING MO.P.S.C. SCHEDULE NO. 5 Original SHEET NO. 98.9APPLYING TO MISSOURI SERVICE AREA**RIDER FAC****FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)****(Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)**

$$FPA_{(RP)} = [[(CF+CPP-OSSR-TS-S-W) - (NBFC \times S_{AP})] \times 95\% + I + R - N] / S_{RP}$$

The FPA rate, which will be multiplied by the voltage level adjustment factors set forth below, applicable starting with the following Recovery Period is calculated as:

$$FPA_C = FPA_{(RP)} + FPA_{(RP-1)} + FPA_{(RP-2)}$$

where:

FPA_C = Fuel and Purchased Power Adjustment rate applicable starting with the Recovery Period following the applicable Filing Date.

FPA_{RP} = FPA Recovery Period rate component calculated to recover under/over collection during the Accumulation Period that ended prior to the applicable Filing Date.

$FPA_{(RP-1)}$ = FPA Recovery Period rate component from prior FPA_{RP} calculation, if any.

$FPA_{(RP-2)}$ = FPA Recovery Period rate component from FPA_{RP} calculation prior to $FPA_{(RP-1)}$, if any.

CF = Fuel costs incurred to support sales to all retail customers and Off-System Sales allocated to Missouri retail electric operations, including transportation, associated with the Company's generating plants. These costs consist of the following:

a) For fossil fuel or hydroelectric plants:

(i) the following costs reflected in Federal Energy Regulatory Commission (FERC) Account Number 501: coal commodity, applicable taxes, gas, alternative fuels, fuel additives, Btu adjustments assessed by coal suppliers, quality adjustments related to the sulfur content of coal assessed by coal suppliers, costs and revenues for SO₂ and NO_x emission allowances, railroad transportation, switching and demurrage charges, railcar repair and inspection costs, railcar depreciation, railcar lease costs, similar costs associated with other applicable modes of transportation, fuel hedging costs (for purposes of factor CF, hedging is defined as realized losses and costs minus realized gains associated with mitigating volatility in the Company's cost of fuel and purchased power, including but not limited to, the Company's use of futures, options and over-the-counter derivatives including, without limitation, futures contracts, puts, calls, caps, floors, collars, and swaps), hedging costs associated with SO₂ and fuel oil

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MO.P.S.C. SCHEDULE NO. 5 1st Revised SHEET NO. 98.10CANCELLING MO.P.S.C. SCHEDULE NO. 5 Original SHEET NO. 98.10APPLYING TO MISSOURI SERVICE AREARIDER FACFUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

(Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)

adjustments included in commodity and transportation costs, broker commissions and fees associated with price hedges, oil costs, ash disposal revenues and expenses, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and

(ii) the following costs reflected in FERC Account Number 547: natural gas generation costs related to commodity, oil, transportation, storage, capacity reservation charges, fuel losses, hedging costs, and revenues and expenses resulting from fuel and transportation portfolio optimization activities;

b) Costs in FERC Account Number 518 (Nuclear Fuel Expense).

CPP = Costs of purchased power reflected in FERC Account Numbers 555, 565, and 575, excluding MISO administrative fees arising under MISO Schedules 10, 16, 17, and 24, and excluding capacity charges for contracts with terms in excess of one (1) year, incurred to support sales to all Missouri retail customers and Off-System Sales allocated to Missouri retail electric operations. Also included in factor "CPP" are insurance premiums in FERC Account Number 924 for replacement power insurance (other than relating to the Taum Sauk Plant) to the extent those premiums are not reflected in base rates. Changes 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. Additionally, costs of purchased power will be reduced by 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 as provided for in this tariff, the premiums and recoveries relating to replacement power insurance coverage for the Taum Sauk Plant shall be included in this CPP Factor.

OSSR = Revenues from Off-System Sales allocated to Missouri electric operations.

Off-System Sales shall include all sales transactions (including MISO revenues in FERC Account Number 447), excluding Missouri retail sales and long-term full and partial requirements sales to Missouri municipalities, that are associated with (1) AmerenUE Missouri jurisdictional generating units, (2) power purchases made to serve Missouri retail load, and (3) any related transmission.

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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)
(Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)

Adjustment For Reduction of Service Classification 12(M) Billing Determinants:

Should the level of monthly billing determinants under Service Classification 12(M) fall below the level of normalized 12(M) monthly billing determinants as established in Case No. ER-2010-0036 an adjustment to OSSR shall be made in accordance with the following levels:

- a) A reduction of less than 40,000,000 kWh in a given month - No adjustment will be made to OSSR.
b) A reduction of 40,000,000 kWh or greater in a given month - All Off-System revenues derived from all kWh of energy sold off-system due to the entire reduction shall be excluded from OSSR.

TS = The Accumulation Period value of Taum Sauk. This factor will be used to reduce actual fuel costs to reflect the value of Taum Sauk, and will be credited in FPA filings (of which there are three each year as shown in the table above), until the next rate case or, if sooner, until Taum Sauk is placed back in service. This value is \$26.8 million annually, one third of which (i.e., \$8.93 million) will be applied to each Accumulation Period.

S = The Accumulation Period value of Blackbox Settlement Amount of \$3 million annually, which shall expire on September 1, 2010. One third of the annual value (\$1 million) shall be applied to each Accumulation Period. For the Accumulation Period during which the factor expires, the factor shall be prorated according to the number of days during which it was effective during that Accumulation Period.

W = \$300,000 per month for the months, July 1, 2010 through, June 30, 2011. This factor "W" expires on June 30, 2011.

N = The positive amount by which, over the course of the Accumulation Period, (a) revenues derived from the off-system sale of power made possible as a result of reductions in the level of 12(M) sales (as addressed in the definition of OSSR above) exceeds (b) the reduction of 12(M) revenues compared to normalized 12(M) revenues as determined in Case No. ER-2010-0036.

I = Interest applicable to (i) the difference between Actual Net Fuel Costs (adjusted for Taum Sauk, factor "S", and factor "W") and NBFC for all kWh of energy supplied to Missouri retail customers during an Accumulation Period until those costs have been recovered; (ii) refunds due to prudence reviews (a portion of factor R, below); and (iii) all under- or over-recovery

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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)
 (Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)

balances created through operation of this FAC, as determined in the true-up filings provided for herein (a portion of factor R, below). Interest shall be calculated monthly at a rate equal to the weighted average interest rate paid on the Company's short-term debt, applied to the month-end balance of items (i) through (iii) in the preceding sentence.

- R = Under/over recovery (if any) from currently active and prior Recovery Periods as determined for the FAC true-up adjustments, and modifications due to adjustments ordered by the Commission (other than the adjustment for Taum Sauk as already reflected in the TS factor), as a result of required prudence reviews or other disallowances and reconciliations, with interest as defined in item I.
- S_{AP} = Supplied kWh during the Accumulation Period that ended prior to the applicable Filing Date, at the generation level, plus the kWh reductions up to the kWh of energy sold off-system associated with the 12(M) OSSR adjustment above.
- S_{RP} = Applicable Recovery Period estimated kWh, at the generation level, subject to the FPA_{RP} to be billed.
- NBFC = Net Base Fuel Costs are the net costs determined by the Commission's order as the normalized test year value (and reflecting an adjustment for Taum Sauk, consistent with the term TS) for the sum of allowable fuel costs (consistent with the term CF), plus cost of purchased power (consistent with the term CPP), less revenues from off-system sales (consistent with the term OSSR), less adjustments (consistent with the terms "S" and "W"), expressed in cents per kWh, at the generation level, as included in the Company's retail rates. The NBFC rate applicable to June through September calendar months ("Summer NBFC Rate") is 1.236 cents per kWh. The NBFC rate applicable to October through May calendar months ("Winter NBFC Rate") is 1.044 cents per kWh.

To determine the FPA rates applicable to the individual Service Classifications, the FPA_c rate determined in accordance with the foregoing will be multiplied by the following voltage level adjustment factors:

Secondary Voltage Service	1.0789
Primary Voltage Service	1.0459
Large Transmission Voltage Service	1.0124

The FPA rates applicable to the individual Service Classifications shall be rounded to the nearest 0.001 cents, to be charged on a cents/kWh basis for each applicable kWh billed.

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CANCELLING MO.P.S.C. SCHEDULE NO. 5 Original SHEET NO. 98.13

APPLYING TO MISSOURI SERVICE AREA

RIDER FAC
FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)
(Applicable To Service Provided Between June 21, 2010 And The Effective Date Of This Tariff)

TRUE-UP OF FAC

After completion of each Recovery Period, the Company will make a true-up filing in conjunction with an adjustment to its FAC, where applicable. The true-up filings shall be made on the first Filing Date that occurs at least two (2) months after completion of each Recovery Period. Any true-up adjustments or refunds shall be reflected in item R above, and shall include interest calculated as provided for in item I above.

The true-up adjustments shall be the difference between the revenues billed and the revenues authorized for collection during the Recovery Period.

GENERAL RATE CASE/PRUDENCE REVIEWS

The following shall apply to this Fuel and Purchased Power Adjustment Clause, in accordance with Section 386.266.4, RSMo. and applicable Missouri Public Service Commission Rules governing rate adjustment mechanisms established under Section 386.266, RSMo:

The Company shall file a general rate case with the effective date of new rates to be no later than four years after the effective date of a Missouri Public Service Commission order implementing or continuing this Fuel and Purchased Power Adjustment Clause. The four-year period referenced above shall not include any periods in which the Company is prohibited from collecting any charges under this Fuel and Purchased Power Adjustment Clause, or any period for which charges hereunder must be fully refunded. In the event a court determines that this Fuel and Purchased Power Adjustment Clause is unlawful and all moneys collected hereunder are fully refunded, the Company shall be relieved of the obligation under this Fuel and Purchased Power Adjustment Clause to file such a rate case.

Prudence reviews of the costs subject to this Fuel and Purchased Power Adjustment Clause shall occur no less frequently than every eighteen months, and any such costs which are determined by the Missouri Public Service Commission to have been imprudently incurred shall be returned to customers with interest at a rate equal to the weighted average interest rate paid on the Company's short-term debt.

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APPLYING TO MISSOURI SERVICE AREA

<u>RIDER FAC</u>			
<u>FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)</u>			
(Applicable for the billing months of October 2010 Through The Billing Months of XXXXXXX)			
<u>Calculation of Current FPA_C Rate:</u>			
Accumulation Period Ending:			May 31, 2010
1. Total Energy Cost (CF+CPP-OSSR-TS-S-W)			\$159,987,597
2. Base Energy Cost	-		\$85,013,117
2.1 NBFC (\$/kWh)	x		\$0.0069
2.2 Accumulation Period Sales kWh (S _{AP})		12,320,741,546	
3. First Subtotal (1.-2.)			\$74,974,480
4. Customer Responsibility	x	95%	
5. Second Subtotal			\$71,225,756
6. Adjustment for Interest plus Under / Over recovery for Prior Periods less Factor N: (I + R - N)	±		\$392,705
7. Third Subtotal			\$71,618,461
8. Estimated Recovery Period Sales kWh (S _{RP})	÷	40,791,485,000	
9. FPA _{RP}			\$0.00176
10. FPA _{RP-1}	+		\$0.00114
11. FPA _{RP-2}	+		\$0.00046
12. FPA _C (without Voltage Level Adjustment)			\$0.00336
13. Voltage Level Adjustment Factor			
13.1 Secondary	x		1.0888
13.2 Primary	x		1.0492
13.3 Large Transmission	x		1.0147
14. FPA _C (with voltage level adjustment)			
14.1 Secondary			\$0.00366
14.2 Primary			\$0.00353
14.3 Large Transmission			\$0.00341

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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

APPLICABILITY

This rider is applicable to kilowatt-hours (kWh) of energy supplied to customers served by the Company under Service Classification Nos. 1(M), 2(M), 3(M), 4(M), 5(M), 6(M), 7(M), 8(M), 11(M), and 12(M).

Costs passed through this Fuel and Purchased Power Adjustment Clause (FAC) reflect differences between actual fuel and purchased power costs, including transportation, net of Off-System Sales Revenues (OSSR) (i.e., Actual Net Fuel Costs) and Net Base Fuel Costs (factor NBFC, as defined below), calculated and recovered as provided for herein.

The Accumulation Periods and Recovery Periods are as set forth in the following table:

<u>Accumulation Period (AP)</u>	<u>Filing Date</u>	<u>Recovery Period (RP)</u>
February through May	By August 1	October through September
June through September	By December 1	February through January
October through January	By April 1	June through May

Accumulation Period (AP) means the historical calendar months during which fuel and purchased power costs, including transportation, net of OSSR for all kWh of energy supplied to Missouri retail customers are determined.

Recovery Period (RP) means the billing months as set forth in the above table during which the difference between the Actual Net Fuel Costs during an Accumulation Period and NBFC are applied to and recovered through retail customer billings on a per kWh basis, as adjusted for service voltage level.

The Company will make a Fuel and Purchased Power Adjustment (FPA) filing by each Filing Date. The new FPA rates for which the filing is made will be applicable starting with the Recovery Period that begins following the Filing Date. All FPA filings shall be accompanied by detailed workpapers supporting the filing in an electronic format with all formulas intact.

FPA DETERMINATION

Ninety five percent (95%) of the difference between Actual Net Fuel Costs and NBFC for all kWh of energy supplied to Missouri retail customers during the respective Accumulation Periods shall be reflected as an FPA_c credit or debit, stated as a separate line item on the customer's bill and will be calculated according to the following formulas.

For the FPA filing made by each Filing Date, the FPA_c rate, applicable starting with the Recovery Period following the applicable Filing Date, to recover fuel and purchased power costs, including transportation, net of OSSR, to the extent they vary from Net Base Fuel Costs (NBFC), as defined below, during the recently-completed Accumulation Period is calculated as:

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NAME OF OFFICER TITLE ADDRESS

MO.P.S.C. SCHEDULE NO. 5 Original SHEET NO. 98.16

CANCELLING MO.P.S.C. SCHEDULE NO. _____ SHEET NO. _____

APPLYING TO MISSOURI SERVICE AREARIDER FACFUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

$$FPA_{(RP)} = [[(CF+CPP-OSSR-W) - (NBFC \times S_{AD})] \times 95\% + I + R - N] / S_{RP}$$

The FPA rate, which will be multiplied by the voltage level adjustment factors set forth below, applicable starting with the following Recovery Period is calculated as:

$$FPA_C = FPA_{(RP)} + FPA_{(RP-1)} + FPA_{(RP-2)}$$

where:

FPA_C = Fuel and Purchased Power Adjustment rate applicable starting with the Recovery Period following the applicable Filing Date.

FPA_{RP} = FPA Recovery Period rate component calculated to recover under/over collection during the Accumulation Period that ended prior to the applicable Filing Date.

$FPA_{(RP-1)}$ = FPA Recovery Period rate component from prior FPA_{RP} calculation, if any.

$FPA_{(RP-2)}$ = FPA Recovery Period rate component from FPA_{RP} calculation prior to $FPA_{(RP-1)}$, if any.

CF = Fuel costs incurred to support sales to all retail customers and Off-System Sales allocated to Missouri retail electric operations, including transportation, associated with the Company's generating plants. These costs consist of the following:

a) For fossil fuel or hydroelectric plants:

(i) the following costs reflected in Federal Energy Regulatory Commission (FERC) Account Number 501: coal commodity, applicable taxes, gas, alternative fuels, fuel additives, Btu adjustments assessed by coal suppliers, quality adjustments related to the sulfur content of coal assessed by coal suppliers, railroad transportation, switching and demurrage charges, railcar repair and inspection costs, railcar depreciation, railcar lease costs, similar costs associated with other applicable modes of transportation, fuel hedging costs (for purposes of factor CF, hedging is defined as realized losses and costs minus realized gains associated with mitigating volatility in the Company's cost of fuel and purchased power, including but not limited to, the Company's use of futures, options and over-the-counter derivatives including, without limitation, futures contracts, puts, calls, caps, floors, collars, and swaps), hedging costs associated with SO₂ and fuel oil

DATE OF ISSUE September 3, 2010 DATE EFFECTIVE October 3, 2010ISSUED BY Warner L. Baxter President & CEO St. Louis, Missouri
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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

adjustments included in commodity and transportation costs, broker commissions and fees associated with price hedges, oil costs, ash disposal revenues and expenses, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and

(ii) the following costs reflected in FERC Account Number 547: natural gas generation costs related to commodity, oil, transportation, storage, capacity reservation charges, fuel losses, hedging costs, and revenues and expenses resulting from fuel and transportation portfolio optimization activities; and

(iii) costs and revenues for SO₂ and NO_x emission allowances;

b) Costs in FERC Account Number 518 (Nuclear Fuel Expense).

CPP = Costs of purchased power reflected in FERC Account Numbers 555, 565, and 575, excluding MISO administrative fees arising under MISO Schedules 10, 16, 17, and 24, and excluding capacity charges for contracts with terms in excess of one (1) year, incurred to support sales to all Missouri retail customers and Off-System Sales allocated to Missouri retail electric operations. Also included in factor "CPP" are insurance premiums in FERC Account Number 924 for replacement power insurance to the extent those premiums are not reflected in base rates. Changes in replacement power insurance premiums from the level reflected in base rates shall increase or decrease purchased power costs. Additionally, costs of purchased power will be reduced by expected replacement power insurance recoveries qualifying as assets under Generally Accepted Accounting Principles.

OSSR = Revenues from Off-System Sales allocated to Missouri electric operations.

Off-System Sales shall include all sales transactions (including MISO revenues in FERC Account Number 447), that are associated with (1) AmerenUE Missouri jurisdictional generating units, (2) power purchases made to serve Missouri retail load, and (3) any related transmission.

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RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

Adjustment For Reduction of Service Classification 12(M) Billing Determinants:

Should the level of monthly billing determinants under Service Classification 12(M) fall below the level of normalized 12(M) monthly billing determinants as established in Case No. ER-2010-0036 an adjustment to OSSR shall be made in accordance with the following levels:

- a) A reduction of less than 40,000,000 kWh in a given month
- No adjustment will be made to OSSR.
- b) A reduction of 40,000,000 kWh or greater in a given month
- All Off-System Sales revenues derived from all kWh of energy sold off-system due to the entire reduction shall be excluded from OSSR.

W = \$300,000 per month for the months, July 1, 2010 through, June 30, 2011. This factor "W" expires on June 30, 2011.

N = The positive amount by which, over the course of the Accumulation Period, (a) revenues derived from the off-system sale of power made possible as a result of reductions in the level of 12(M) sales (as addressed in the definition of OSSR above) exceeds (b) the reduction of 12(M) revenues compared to normalized 12(M) revenues as determined in Case No. ER-2010-0036.

I = Interest applicable to (i) the difference between Actual Net Fuel Costs (adjusted for factor "W") and NBFC for all kWh of energy supplied to Missouri retail customers during an Accumulation Period until those costs have been recovered; (ii) refunds due to prudence reviews (a portion of factor R, below); and (iii) all under- or over-recovery balances created through operation of this FAC, as determined in the true-up filings provided for herein (a portion of factor R, below). Interest shall be calculated monthly at a rate equal to the weighted average interest rate paid on the Company's short-term debt, applied to the month-end balance of items (i) through (iii) in the preceding sentence.

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FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

- R = Under/over recovery (if any) from currently active and prior Recovery Periods as determined for the FAC true-up adjustments, and modifications due to adjustments ordered by the Commission , as a result of required prudence reviews or other disallowances and reconciliations, with interest as defined in item I.
- S_{AP} = Supplied kWh during the Accumulation Period that ended prior to the applicable Filing Date, at the generation level, plus the kWh reductions up to the kWh of energy sold off-system associated with the 12(M) OSSR adjustment above.
- S_{RP} = Applicable Recovery Period estimated kWh, at the generation level, subject to the FPA_{RP} to be billed.
- NBFC = Net Base Fuel Costs are the net costs determined by the Commission's order as the normalized test year value for the sum of allowable fuel costs (consistent with the term CF), plus cost of purchased power (consistent with the term CPP), less revenues from off-system sales (consistent with the term OSSR), less an adjustment (consistent with the term "W"), expressed in cents per kWh, at the generation level, as included in the Company's retail rates. The NBFC rate applicable to June through September calendar months ("Summer NBFC Rate") is 1.312 cents per kWh. The NBFC rate applicable to October through May calendar months ("Winter NBFC Rate") is 1.275 cents per kWh.

To determine the FPA rates applicable to the individual Service Classifications, the FPA_c rate determined in accordance with the foregoing will be multiplied by the following voltage level adjustment factors:

Secondary Voltage Service	1.0789
Primary Voltage Service	1.0459
Large Transmission Voltage Service	1.0124

The FPA rates applicable to the individual Service Classifications shall be rounded to the nearest 0.001 cents, to be charged on a cents/kWh basis for each applicable kWh billed.

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APPLYING TO MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

Applicable To Service Provided On The Effective Date Of This Tariff And Thereafter

TRUE-UP OF FAC

After completion of each Recovery Period, the Company will make a true-up filing in conjunction with an adjustment to its FAC, where applicable. The true-up filings shall be made on the first Filing Date that occurs at least two (2) months after completion of each Recovery Period. Any true-up adjustments or refunds shall be reflected in item R above, and shall include interest calculated as provided for in item I above.

The true-up adjustments shall be the difference between the revenues billed and the revenues authorized for collection during the Recovery Period.

GENERAL RATE CASE/PRUDENCE REVIEWS

The following shall apply to this Fuel and Purchased Power Adjustment Clause, in accordance with Section 386.266.4, RSMo. and applicable Missouri Public Service Commission Rules governing rate adjustment mechanisms established under Section 386.266, RSMo:

The Company shall file a general rate case with the effective date of new rates to be no later than four years after the effective date of a Missouri Public Service Commission order implementing or continuing this Fuel and Purchased Power Adjustment Clause. The four-year period referenced above shall not include any periods in which the Company is prohibited from collecting any charges under this Fuel and Purchased Power Adjustment Clause, or any period for which charges hereunder must be fully refunded. In the event a court determines that this Fuel and Purchased Power Adjustment Clause is unlawful and all moneys collected hereunder are fully refunded, the Company shall be relieved of the obligation under this Fuel and Purchased Power Adjustment Clause to file such a rate case.

Prudence reviews of the costs subject to this Fuel and Purchased Power Adjustment Clause shall occur no less frequently than every eighteen months, and any such costs which are determined by the Missouri Public Service Commission to have been imprudently incurred shall be returned to customers with interest at a rate equal to the weighted average interest rate paid on the Company's short-term debt.

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APPLYING TO

MISSOURI SERVICE AREA

RIDER FAC

FUEL AND PURCHASED POWER ADJUSTMENT CLAUSE (CONT'D.)

(Applicable for the billing months beginning **TBD**, 2011 and thereafter)

Calculation of Current FPA_C Rate:

Accumulation Period Ending:		mm/dd/yy
1. Total Energy Cost (CF+CPP-OSSR-W)		\$0
2. Base Energy Cost	-	
2.1 NBFC (\$/kWh)	x	\$0.0000
2.2 Accumulation Period Sales kWh (S _{AP})		0
3. First Subtotal (1.-2.)		\$0
4. Customer Responsibility	x	95%
5. Second Subtotal		\$0
6. Adjustment for Interest plus Under / Over recovery for Prior Periods less Factor N: (I + R - N)	±	\$0
7. Third Subtotal		\$0
8. Estimated Recovery Period Sales kWh (S _{RP})	÷	0
9. FPA _{RP}		\$0.0000
10. FPA _{RP-1}	+	\$0.0000
11. FPA _{RP-2}	+	\$0.0000
12. FPA _C (without Voltage Level Adjustment)		\$0.0000
13. Voltage Level Adjustment Factor		
13.1 Secondary	x	1.0789
13.2 Primary	x	1.0459
13.3 Large Transmission	x	1.0124
14. FPA _C (with voltage level adjustment)		
14.1 Secondary		\$0.0000
14.2 Primary		\$0.0000
14.3 Large Transmission		\$0.0000

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ISSUED BY Warner L. Baxter
NAME OF OFFICER

President & CEO
TITLE

St. Louis, Missouri
ADDRESS

MO.P.S.C. SCHEDULE NO. 5

21st Revised

SHEET NO. 99

CANCELLING MO.P.S.C. SCHEDULE NO. 5

20th Revised

SHEET NO. 99

APPLYING TO

MISSOURI SERVICE AREA

Rider B

DISCOUNTS APPLICABLE FOR SERVICE TO SUBSTATIONS OWNED
BY CUSTOMER IN LIEU OF COMPANY OWNERSHIP

Where a Customer served under rate schedules 4(M) or 11 (M) takes delivery of power and energy at a delivery voltage of 34kV or higher, Company will allow discounts from its applicable rate schedule as follows:

- *1. A monthly credit of \$1.10/kW of billing demand for customers taking service at 34.5 or 69kV
- *2. A monthly credit of \$1.30/kW of billing demand for customers taking service at 115kV or higher

*Indicates Change.

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President & CEO
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AmerenUE
CASE NO. ER-2011-0028
PRESENT AND PROPOSED CLASS REVENUE REQUIREMENTS
 (\$000's)

<u>Customer Class</u>	<u>Current Base Revenue</u>	<u>Proposed Base Revenue</u>	<u>Required Revenue Adjustment</u>	<u>% Change</u>
Residential	\$ 1,094,131	\$ 1,212,316	\$ 118,185	10.8%
Small General Service	\$ 280,137	\$ 310,379	\$ 30,242	10.8%
Large General Service	\$ 515,986	\$ 571,696	\$ 55,710	10.8%
Small Primary Service	\$ 195,932	\$ 217,090	\$ 21,158	10.8%
Large Primary Service	\$ 181,019	\$ 200,579	\$ 19,560	10.8%
Large Transmission Service	\$ 139,375	\$ 154,426	\$ 15,052	10.8%
Lighting	<u>\$ 31,160</u>	<u>\$ 34,526</u>	<u>\$ 3,366</u>	<u>10.8%</u>
Total	\$ 2,437,740	\$ 2,701,012	\$ 263,273 (1)	10.8%

(1) - Targeted increase from Company witness Mr. Gary Weiss testimony is \$263,313; however, rate rounding resulted in a shortfall of approximately \$40K.

MISSOURI
 RESIDENTIAL SERVICE CLASSIFICATION NO. 1(M)
 TYPICAL MONTHLY BILLS - EXCLUDING TAXES

<u>kWh</u>	<u>AVERAGE MONTHLY BILL</u>
100	\$18.58
150	\$22.85
200	\$27.12
250	\$31.40
300	\$35.67
350	\$39.95
400	\$44.22
450	\$48.49
500	\$52.76
550	\$57.04
600	\$61.31
650	\$65.59
700	\$69.86
750	\$74.13
800	\$77.57
850	\$81.01
900	\$84.44
950	\$87.88
1000	\$91.32
1100	\$98.19
1200	\$105.06
1300	\$111.94
1400	\$118.81
1500	\$125.68
1600	\$132.56
1700	\$139.43
1800	\$146.30
1900	\$153.18
2000	\$160.05
2500	\$194.42
3000	\$228.78
3500	\$263.15
4000	\$297.52
4500	\$331.88
5000	\$366.25

MISSOURI
 SMALL GENERAL SERVICE CLASSIFICATION NO. 2 (M)
 TYPICAL MONTHLY BILLS - EXCLUDING TAXES
 SINGLE-PHASE SERVICE

kWh	AVERAGE MONTHLY BILL
0	\$11.05
50	\$15.26
100	\$19.47
300	\$36.31
400	\$44.73
500	\$53.15
600	\$61.57
700	\$69.99
800	\$78.41
900	\$86.83
1000	\$95.25
2,000	\$179.45
3,000	\$263.65
4,000	\$347.85
5,000	\$432.05
6,000	\$516.25
7,000	\$600.45
8,000	\$684.65
9,000	\$768.85
10,000	\$853.05
11,000	\$937.25
12,000	\$1,021.45
13,000	\$1,105.65
14,000	\$1,189.85
15,000	\$1,274.05
16,000	\$1,358.25
17,000	\$1,442.45
18,000	\$1,526.65
19,000	\$1,610.85
20,000	\$1,695.05
21,000	\$1,779.25
22,000	\$1,863.45
23,000	\$1,947.65
24,000	\$2,031.85
25,000	\$2,116.05
30,000	\$2,537.05
35,000	\$2,958.05
40,000	\$3,379.05
45,000	\$3,800.05
50,000	\$4,221.05

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
 SMALL GENERAL SERVICE CLASSIFICATION NO. 2 (M)
 TYPICAL MONTHLY BILLS - EXCLUDING TAXES
 THREE-PHASE SERVICE

kWh	AVERAGE MONTHLY BILL
0	\$22.05
50	\$26.26
100	\$30.47
300	\$47.31
400	\$55.73
500	\$64.15
600	\$72.57
700	\$80.99
800	\$89.41
900	\$97.83
1000	\$106.25
2,000	\$190.45
3,000	\$274.65
4,000	\$358.85
5,000	\$443.05
6,000	\$527.25
7,000	\$611.45
8,000	\$695.65
9,000	\$779.85
10,000	\$864.05
11,000	\$948.25
12,000	\$1,032.45
13,000	\$1,116.65
14,000	\$1,200.85
15,000	\$1,285.05
16,000	\$1,369.25
17,000	\$1,453.45
18,000	\$1,537.65
19,000	\$1,621.85
20,000	\$1,706.05
21,000	\$1,790.25
22,000	\$1,874.45
23,000	\$1,958.65
24,000	\$2,042.85
25,000	\$2,127.05
30,000	\$2,548.05
35,000	\$2,969.05
40,000	\$3,390.05
45,000	\$3,811.05
50,000	\$4,232.05

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
LARGE GENERAL SERVICE CLASSIFICATION NO. 3 (M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

<u>kW</u>	<u>kWh/kW</u>	<u>kWh</u>	<u>AVERAGE MONTHLY BILL</u>
100	100	10,000	\$1,093.74
	200	20,000	\$1,741.74
	300	30,000	\$2,296.41
	400	40,000	\$2,778.74
	500	50,000	\$3,188.74
	600	60,000	\$3,598.74
	700	70,000	\$4,008.74
500	100	50,000	\$5,117.74
	200	100,000	\$8,357.74
	300	150,000	\$11,131.07
	400	200,000	\$13,542.74
	500	250,000	\$15,592.74
	600	300,000	\$17,642.74
	700	350,000	\$19,692.74
1000	100	100,000	\$10,147.74
	200	200,000	\$16,627.74
	300	300,000	\$22,174.41
	400	400,000	\$26,997.74
	500	500,000	\$31,097.74
	600	600,000	\$35,197.74
	700	700,000	\$39,297.74
2,000	100	200,000	\$20,207.74
	200	400,000	\$33,167.74
	300	600,000	\$44,261.07
	400	800,000	\$53,907.74
	500	1,000,000	\$62,107.74
	600	1,200,000	\$70,307.74
	700	1,400,000	\$78,507.74
3,000	100	300,000	\$30,267.74
	200	600,000	\$49,707.74
	300	900,000	\$66,347.74
	400	1,200,000	\$80,817.74
	500	1,500,000	\$93,117.74
	600	1,800,000	\$105,417.74
	700	2,100,000	\$117,717.74
5,000	100	500,000	\$50,387.74
	200	1,000,000	\$82,787.74
	300	1,500,000	\$110,521.07
	400	2,000,000	\$134,637.74
	500	2,500,000	\$155,137.74
	600	3,000,000	\$175,637.74
	700	3,500,000	\$196,137.74

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
SMALL PRIMARY SERVICE CLASSIFICATION NO. 4 (M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
100	100	10,000	\$1,220.22
	200	20,000	\$1,846.72
	300	30,000	\$2,383.72
	400	40,000	\$2,849.89
	500	50,000	\$3,245.22
	600	60,000	\$3,640.55
	700	70,000	\$4,035.89
500	100	50,000	\$4,952.22
	200	100,000	\$8,084.72
	300	150,000	\$10,769.72
	400	200,000	\$13,100.55
	500	250,000	\$15,077.22
	600	300,000	\$17,053.89
	700	350,000	\$19,030.55
1000	100	100,000	\$9,617.22
	200	200,000	\$15,882.22
	300	300,000	\$21,252.22
	400	400,000	\$25,913.89
	500	500,000	\$29,867.22
	600	600,000	\$33,820.55
	700	700,000	\$37,773.89
2,000	100	200,000	\$18,947.22
	200	400,000	\$31,477.22
	300	600,000	\$42,217.22
	400	800,000	\$51,540.55
	500	1,000,000	\$59,447.22
	600	1,200,000	\$67,353.89
	700	1,400,000	\$75,260.55
3,000	100	300,000	\$28,277.22
	200	600,000	\$47,072.22
	300	900,000	\$63,182.22
	400	1,200,000	\$77,167.22
	500	1,500,000	\$89,027.22
	600	1,800,000	\$100,887.22
	700	2,100,000	\$112,747.22
5,000	100	500,000	\$46,937.22
	200	1,000,000	\$78,262.22
	300	1,500,000	\$105,112.22
	400	2,000,000	\$128,420.55
	500	2,500,000	\$148,187.22
	600	3,000,000	\$167,953.89
	700	3,500,000	\$187,720.55

(1) - WINTER BILLS EXCLUDE SEASONAL USAGE EFFECT, IF ANY.

MISSOURI
LARGE PRIMARY SERVICE CLASSIFICATION NO. 11(M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

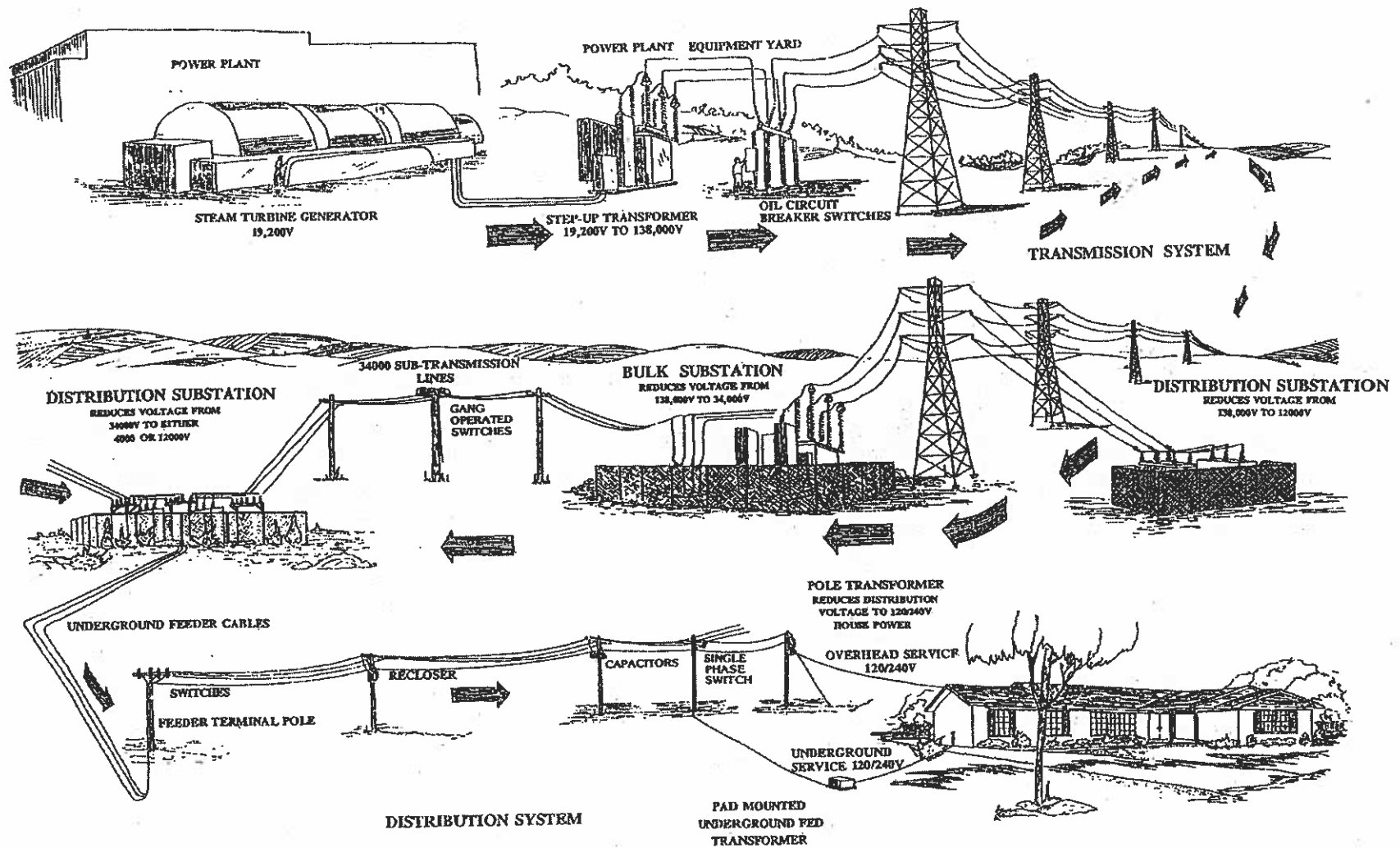
	kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
*	4,000	300	1,200,000	\$96,776.72
		400	1,600,000	\$108,656.72
		500	2,000,000	\$120,536.72
		600	2,400,000	\$132,416.72
		700	2,800,000	\$144,296.72
	5,000	300	1,500,000	\$105,686.72
		400	2,000,000	\$120,536.72
		500	2,500,000	\$135,386.72
		600	3,000,000	\$150,236.72
		700	3,500,000	\$165,086.72
	10,000	300	3,000,000	\$211,036.72
		400	4,000,000	\$240,736.72
		500	5,000,000	\$270,436.72
		600	6,000,000	\$300,136.72
		700	7,000,000	\$329,836.72
	20,000	300	6,000,000	\$421,736.72
		400	8,000,000	\$481,136.72
		500	10,000,000	\$540,536.72
		600	12,000,000	\$599,936.72
		700	14,000,000	\$659,336.72
	30,000	300	9,000,000	\$632,436.72
		400	12,000,000	\$721,536.72
		500	15,000,000	\$810,636.72
		600	18,000,000	\$899,736.72
		700	21,000,000	\$988,836.72
	50,000	300	15,000,000	\$1,053,836.72
		400	20,000,000	\$1,202,336.72
		500	25,000,000	\$1,350,836.72
		600	30,000,000	\$1,499,336.72
		700	35,000,000	\$1,647,836.72
	100,000	300	30,000,000	\$2,107,336.72
		400	40,000,000	\$2,404,336.72
		500	50,000,000	\$2,701,336.72
		600	60,000,000	\$2,998,336.72
		700	70,000,000	\$3,295,336.72

* - BILLS REFLECT MINIMUM BILLING DEMAND OF 5,000 kW.

MISSOURI
LARGE TRANSMISSION SERVICE CLASSIFICATION NO. 12 (M)
TYPICAL MONTHLY BILLS - EXCLUDING TAXES

	kW	kWh/kW	kWh	AVERAGE MONTHLY BILL
*	4,000	300	1,200,000	\$72,977.67
		400	1,600,000	\$82,852.33
		500	2,000,000	\$92,727.00
		600	2,400,000	\$102,601.67
		700	2,800,000	\$112,476.33
	5,000	300	1,500,000	\$80,383.67
		400	2,000,000	\$92,727.00
		500	2,500,000	\$105,070.33
		600	3,000,000	\$117,413.67
		700	3,500,000	\$129,757.00
	10,000	300	3,000,000	\$158,980.33
		400	4,000,000	\$183,667.00
		500	5,000,000	\$208,353.67
		600	6,000,000	\$233,040.33
		700	7,000,000	\$257,727.00
	20,000	300	6,000,000	\$316,173.67
		400	8,000,000	\$365,547.00
		500	10,000,000	\$414,920.33
		600	12,000,000	\$464,293.67
		700	14,000,000	\$513,667.00
	30,000	300	9,000,000	\$473,367.00
		400	12,000,000	\$547,427.00
		500	15,000,000	\$621,487.00
		600	18,000,000	\$695,547.00
		700	21,000,000	\$769,607.00
	50,000	300	15,000,000	\$787,753.67
		400	20,000,000	\$911,187.00
		500	25,000,000	\$1,034,620.33
		600	30,000,000	\$1,158,053.67
		700	35,000,000	\$1,281,487.00
	100,000	300	30,000,000	\$1,573,720.33
		400	40,000,000	\$1,820,587.00
		500	50,000,000	\$2,067,453.67
		600	60,000,000	\$2,314,320.33
		700	70,000,000	\$2,561,187.00

GENERATING AND POWER DISTRIBUTION SYSTEM



AmerenUE
MISSOURI ELECTRIC OPERATIONS
CLASS COST OF SERVICE ALLOCATION STUDY

TITLE: SUMMARY CURRENT ROR RESULTS (\$000'S)

	<u>MISSOURI</u>	<u>RESIDENTIAL</u>	<u>SMALL GEN SERV</u>	<u>LARGE G.S. / SMALL PRIMARY</u>	<u>LARGE PRIMARY</u>	<u>LARGE TRANS</u>	<u>LIGHTING</u>
1 BASE REVENUE	\$ 2,437,740	\$ 1,094,131	\$ 280,137	\$ 711,918	\$ 181,019	\$ 139,375	\$ 31,160
2 OTHER REVENUE	\$ 71,988	\$ 39,753	\$ 6,841	\$ 16,621	\$ 4,333	\$ 3,808	\$ 632
3 LIGHTING REVENUE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4 SYSTEM, OFF-SYS SALES & DISP OF ALLOW	\$ 389,344	\$ 146,722	\$ 37,697	\$ 122,978	\$ 38,947	\$ 41,027	\$ 1,972
5 RATE REVENUE VARIANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6 TOTAL OPERATING REVENUE	\$ 2,899,072	\$ 1,280,607	\$ 324,676	\$ 851,517	\$ 224,299	\$ 184,209	\$ 33,764
7							
8 TOTAL PROD, T&D, CUST, AND A&G EXP	\$ 1,791,698	\$ 779,227	\$ 180,071	\$ 511,553	\$ 155,008	\$ 145,300	\$ 20,538
9 TOTAL DEPR AND AMMORT EXPENSES	\$ 426,931	\$ 228,733	\$ 46,677	\$ 103,579	\$ 23,754	\$ 15,286	\$ 8,903
10 REAL ESTATE AND PROPERTY TAXES	\$ 135,868	\$ 70,713	\$ 15,062	\$ 33,662	\$ 8,150	\$ 5,760	\$ 2,521
11 INCOME TAXES	\$ 208,419	\$ 106,629	\$ 22,350	\$ 53,140	\$ 13,222	\$ 9,731	\$ 3,346
12 PAYROLL TAXES	\$ 23,610	\$ 11,399	\$ 2,441	\$ 6,243	\$ 1,757	\$ 1,349	\$ 422
13 FEDERAL EXCISE TAX	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
14 REVENUE TAXES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15							
16 TOTAL OPERATING EXPENSES	\$ 2,586,527	\$ 1,196,701	\$ 266,602	\$ 708,176	\$ 201,892	\$ 177,426	\$ 35,729
17							
18 NET OPERATING INCOME	\$ 312,545	\$ 83,906	\$ 58,074	\$ 143,341	\$ 22,407	\$ 6,783	\$ (1,965)
19							
20 GROSS PLANT IN SERVICE	\$14,123,637	\$ 7,352,563	\$ 1,562,544	\$ 3,505,018	\$ 845,473	\$ 596,896	\$ 261,144
21 RESERVES FOR DEPRECIATION	\$ 5,937,666	\$ 3,112,141	\$ 660,658	\$ 1,452,001	\$ 346,466	\$ 243,881	\$ 122,519
22							
23 NET PLANT IN SERVICE	\$ 8,185,971	\$ 4,240,422	\$ 901,886	\$ 2,053,017	\$ 499,007	\$ 353,014	\$ 138,625
24							
25 MATERIALS & SUPPLIES - FUEL	\$ 371,450	\$ 139,979	\$ 35,965	\$ 117,326	\$ 37,157	\$ 39,142	\$ 1,881
26 MATERIALS & SUPPLIES -LOCAL	\$ 45,574	\$ 28,896	\$ 5,327	\$ 7,875	\$ 1,575	\$ 1	\$ 1,900
27 CASH WORKING CAPITAL	\$ 25,804	\$ 11,223	\$ 2,593	\$ 7,368	\$ 2,232	\$ 2,093	\$ 296
28 CUSTOMER ADVANCES & DEPOSITS	\$ (19,537)	\$ (23)	\$ (16,017)	\$ (3,498)	\$ -	\$ -	\$ -
29 ACCUMULATED DEFERRED INCOME TAXES	\$ (1,799,209)	\$ (936,408)	\$ (199,459)	\$ (445,761)	\$ (107,929)	\$ (76,274)	\$ (33,377)
30							
31 TOTAL NET ORIGINAL COST RATE BASE	\$ 6,810,054	\$ 3,484,089	\$ 730,296	\$ 1,736,328	\$ 432,042	\$ 317,976	\$ 109,324
32							
33 RATE OF RETURN	4.589%	2.408%	7.952%	8.255%	5.186%	2.133%	-1.798%

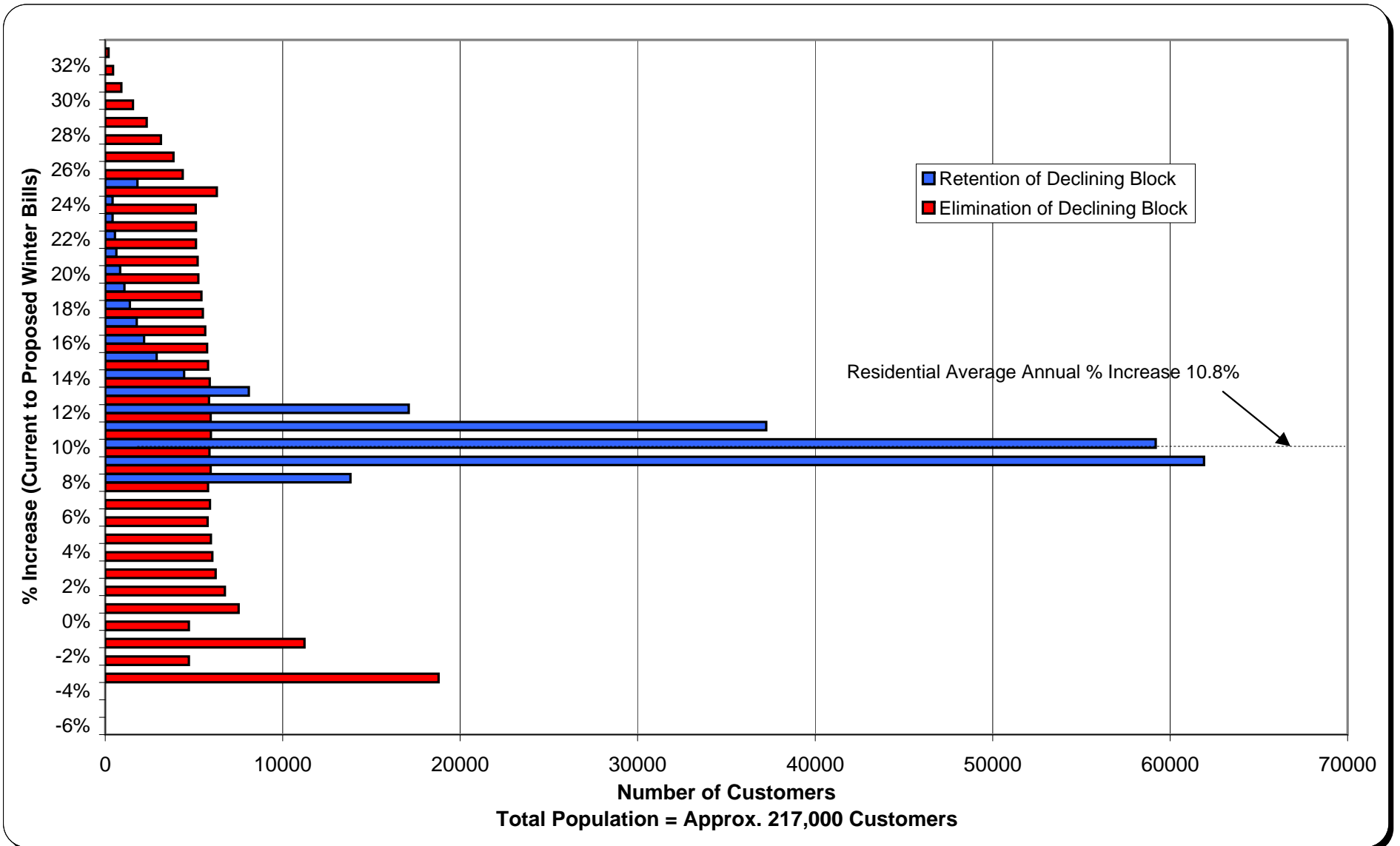
AmerenUE
MISSOURI ELECTRIC OPERATIONS
CLASS COST OF SERVICE ALLOCATION STUDY
EQUALIZED CLASS RATES OF RETURN ANALYSIS

TITLE: SUMMARY EQUAL ROR (\$000's)		<u>MISSOURI</u>	<u>RESIDENTIAL</u>	<u>SMALL GEN SERV</u>	<u>LARGE G.S. / SMALL PRIMARY</u>	<u>LARGE PRIMARY</u>	<u>LARGE TRANS</u>	<u>LIGHTING</u>
1	BASE REVENUE	\$ 2,701,053	\$ 1,304,840	\$ 283,817	\$ 715,401	\$ 195,146	\$ 159,480	\$ 42,370
2	OTHER REVENUE	\$ 71,988	\$ 39,753	\$ 6,841	\$ 16,621	\$ 4,333	\$ 3,808	\$ 632
3	LIGHTING REVENUE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4	SYSTEM, OFF-SYS SALES & DISP OF ALLOW	\$ 389,344	\$ 146,722	\$ 37,697	\$ 122,978	\$ 38,947	\$ 41,027	\$ 1,972
5	RATE REVENUE VARIANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6	TOTAL OPERATING REVENUE	\$ 3,162,385	\$ 1,491,316	\$ 328,356	\$ 855,000	\$ 238,425	\$ 204,314	\$ 44,974
7								
8	TOTAL PROD., T&D, CUSTOMER, AND A&G EXP.	\$ 1,791,698	\$ 779,227	\$ 180,071	\$ 511,553	\$ 155,008	\$ 145,300	\$ 20,538
9	TOTAL DEPR. AND AMMOR. EXPENSES	\$ 426,931	\$ 228,733	\$ 46,677	\$ 103,579	\$ 23,754	\$ 15,286	\$ 8,903
10	REAL ESTATE AND PROPERTY TAXES	\$ 135,868	\$ 70,713	\$ 15,062	\$ 33,662	\$ 8,150	\$ 5,760	\$ 2,521
11	INCOME TAXES	\$ 208,419	\$ 106,629	\$ 22,350	\$ 53,140	\$ 13,222	\$ 9,731	\$ 3,346
12	PAYROLL TAXES	\$ 23,610	\$ 11,399	\$ 2,441	\$ 6,243	\$ 1,757	\$ 1,349	\$ 422
13	FEDERAL EXCISE TAX	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
14	REVENUE TAXES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15								
16	TOTAL OPERATING EXPENSES	\$ 2,586,527	\$ 1,196,701	\$ 266,602	\$ 708,176	\$ 201,892	\$ 177,426	\$ 35,729
17								
18	NET OPERATING INCOME	\$ 575,858	\$ 294,615	\$ 61,754	\$ 146,824	\$ 36,534	\$ 26,888	\$ 9,244
19								
20	GROSS PLANT IN SERVICE	\$ 14,123,637	\$ 7,352,563	\$ 1,562,544	\$ 3,505,018	\$ 845,473	\$ 596,896	\$ 261,144
21	RESERVES FOR DEPRECIATION	\$ 5,937,666	\$ 3,112,141	\$ 660,658	\$ 1,452,001	\$ 346,466	\$ 243,881	\$ 122,519
22								
23	NET PLANT IN SERVICE	\$ 8,185,971	\$ 4,240,422	\$ 901,886	\$ 2,053,017	\$ 499,007	\$ 353,014	\$ 138,625
24								
25	MATERIALS & SUPPLIES - FUEL	\$ 371,450	\$ 139,979	\$ 35,965	\$ 117,326	\$ 37,157	\$ 39,142	\$ 1,881
26	MATERIALS & SUPPLIES -LOCAL	\$ 45,574	\$ 28,896	\$ 5,327	\$ 7,875	\$ 1,575	\$ 1	\$ 1,900
27	CASH WORKING CAPITAL	\$ 25,804	\$ 11,223	\$ 2,593	\$ 7,368	\$ 2,232	\$ 2,093	\$ 296
28	CUSTOMER ADVANCES & DEPOSITS	\$ (19,537)	\$ (23)	\$ (16,017)	\$ (3,498)	\$ -	\$ -	\$ -
29	ACCUMULATED DEFERRED INCOME TAXES	\$ (1,799,209)	\$ (936,408)	\$ (199,459)	\$ (445,761)	\$ (107,929)	\$ (76,274)	\$ (33,377)
30								
31	TOTAL NET ORIGINAL COST RATE BASE	\$ 6,810,054	\$ 3,484,089	\$ 730,296	\$ 1,736,328	\$ 432,042	\$ 317,976	\$ 109,324
32								
33	RATE OF RETURN	8.456%	8.456%	8.456%	8.456%	8.456%	8.456%	8.456%

AmerenUE
CASE NO. ER-2011-0028
PROPOSED CLASS REVENUE REQUIREMENTS
(\$000's)

<u>Customer Class</u>	<u>Proposed Base Revenue</u>
Residential	\$ 1,212,316
Small General Service	\$ 310,379
Large General Service	\$ 571,696
Small Primary Service	\$ 217,090
Large Primary Service	\$ 200,579
Large Transmission Service	\$ 154,426
Lighting	<u>\$ 34,526</u>
Total	\$ 2,701,012

**AmerenUE Residential Space Heat Customers
 Bill Impact Percentage Analysis of Retaining vs. Eliminating Winter Declining Block Rate
 (Proposed Revenues with "Neutrality")**



**AmerenUE Residential Space Heat Customers
Winter Bill Dollar Impact Analysis of Retaining vs. Eliminating Winter Declining Block Rate
(Proposed Revenues with "Neutrality")**

