

Exhibit No.:
Issues: Lack of Relevance of JDA
Agreement on Application to
Participate in MISO through
GridAmerica
Witness: Richard A. Voytas
Sponsoring Party: Union Electric Company
Type of Exhibit: Surrebuttal Testimony
Case No.: EO-2003-0271
Date Testimony Prepared: June 3, 2003

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EO-2003-0271

SURREBUTTAL TESTIMONY

OF

RICHARD A. VOYTAS

ON BEHALF OF

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

**St. Louis, Missouri
June, 2003**

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

Application of Union Electric Company
for Authority to participate in the Midwest
ISO through a contractual relationship
with GridAmerica

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Case No. EO-2003-0271

AFFIDAVIT OF RICHARD A. VOYTAS


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

Richard A. Voytas, being first duly sworn on his oath, states:

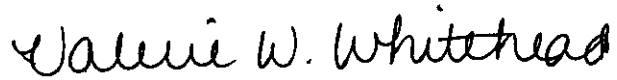
1. My name is Richard A. Voytas. I work in St. Louis, Missouri, and I am employed by Ameren Services Company as Manager of the Corporate Analysis section in the Corporate Planning Department.

2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of 3 pages, which has been prepared in written form for introduction into evidence in the above-referenced docket.

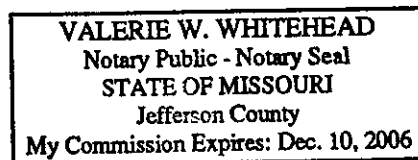
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.


Richard A. Voytas

Subscribed and sworn to before me this 3rd day of June, 2003.


Notary Public

My commission expires: _____



SURREBUTTAL TESTIMONY

OF

RICHARD A. VOYTAS

CASE NO. EO-2003-0271

Q. Please state your name and business address.

A. My name is Richard A. Voytas. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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

A. I am employed by Ameren Services Company as Manager of the Corporate Analysis section in the Corporate Planning Department.

Q. Please describe your educational background, your work experience and the duties of your position.

A. My educational background consists of a Bachelor of Science degree in Mechanical Engineering from the University of Missouri-Rolla in 1975 and a Masters in Business Administration from St. Louis University in 1979. I am a registered professional engineer in the state of Missouri.

I was employed full time by Union Electric Company beginning in May of 1975. Effective with the merger of Union Electric Company and Central Illinois Public Service Company into the Ameren Corporation, I assumed employment with Ameren Services Company. My work experience started at Union Electric Company as an Assistant Engineer in the Engineering and Construction function. I worked as an Assistant Engineer from 1975 to 1977. In 1977 I was promoted to Fuel Buyer in the Supply Services Function. In 1981 I transferred to the Engineering Department at Union

Surrebuttal Testimony of
Richard A. Voytas

1 Electric Company's Rush Island Plant. In 1982 I accepted a position in the coal
2 marketing department at Cities Service Company in Tulsa, Oklahoma. In late 1982 I left
3 Cities Service Company and returned to Union Electric Company as an Engineer in the
4 Corporate Planning Department. From 1982 through 1992 I worked as an Engineer in
5 the Corporate Planning Department, an Engineer in the Quality Improvement Department
6 and an Engineer in the Rate Engineering Department. In 1993 I was promoted to Senior
7 Engineer in the Corporate Planning Department. In 1995 I was promoted to Supervising
8 Engineer in the Demand-Side Management section of Corporate Planning. In July 1998
9 the Resource Planning, Forecasting, Load Research and Demand-Side Management
10 sections were combined into one section of Corporate Planning and I was named
11 Supervisor of that section known as the Corporate Analysis department. Today,
12 Corporate Analysis is divided into four subgroups, which are Resource Planning, Market
13 Modeling, Load Analysis and Forecasting, and Load Research. In October 2001 I was
14 promoted to my present position as Manager - Corporate Analysis.

15 My duties as Manager of Corporate Analysis include overseeing the
16 preparation of the Ameren capacity position both on an annual and weekly basis,
17 preparation of resource plans, development and evaluation of requests and proposals for
18 capacity and energy for Ameren operating companies, preparation of the annual sales and
19 peak demand forecasts, development of the Ameren forward view of electric energy
20 market prices, and the collection, editing and analysis of monthly load research data.

21 **Q. What is the purpose of your Surrebuttal Testimony in this**
22 **proceeding?**

Surrebuttal Testimony of
Richard A. Voytas

1 A. The purpose of my surrebuttal testimony is to support the surrebuttal
2 testimony filed by AmerenUE witness James C. Blessing.

3 **Q. Why is it necessary for you to support the surrebuttal testimony filed**
4 **by AmerenUE witness James Blessing?**

5 A. It is possible that Mr. Blessing will be out of the country during the time
6 period hearings have been scheduled in this proceeding. If Mr. Blessing is not available,
7 I am prepared to testify in his stead.

8 **Q. Have you read the surrebuttal testimony prepared by Mr. Blessing?**

9 A. Yes, I have.

10 **Q. Do you agree with the surrebuttal testimony prepared by**
11 **Mr. Blessing?**

12 A. Yes, I do.

13 **Q. If you were asked the same questions posed to Mr. Blessing in his**
14 **surrebuttal testimony would you answer them the same?**

15 A. Yes, I would.

16 **Q. Does this conclude your Surrebuttal Testimony?**

17 A. Yes, it does.