

OFFICE OF THE PUBLIC COUNSEL
DATA REQUEST

UNION ELECTRIC CO. d/b/a AMEREN MISSOURI
CASE NO. ER-2014-0258

Requested from: Lynn Barnes
Requested by: Lena Mantle
Date Requested: September 17, 2014
Information Requested: Provide a complete explanation of all the costs that Ameren Missouri is requesting recovery of in the FAC proposed in your testimony, the specific major and minor accounts each of these costs are recorded in, the cost recorded in the test year in each of these major and minor accounts, the amount by major and minor account included in Ameren Missouri's Net Base Energy Cost shown in Laura Moore's Schedule LMM-17, and the line on Laura Moore's Schedule LMM-17 which contains the cost.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date:

Prepared by:

OFFICE OF THE PUBLIC COUNSEL
DATA REQUEST

UNION ELECTRIC CO. d/b/a AMEREN MISSOURI
CASE NO. ER-2014-0258

Requested from: Laura Moore
Requested by: Lena Mantle
Date Requested: October 20, 2014
Information Requested: Ameren Missouri's response to data request 8005 is incomplete. It did not provide all of the requested data and is therefore considered unresponsive and deficient.

Data Request 8005 asks for a complete explanation of all of the costs that Ameren Missouri is requesting recover in the FAC it is proposing the Commission to allow in this rate case. Ameren Missouri, in its response to DR 8005, simply states that a complete explanation of all of the costs Ameren Missouri was provided in the MFRs included in Ms. Barnes' testimony. These MFRs did not include all of the costs detailed in Ameren Missouri's exemplar tariff sheets. The MFR states that sums billed by MISO could be found in three different accounts and then gives what MISO schedules are excluded. It does not give the types of MISO costs and a description of the MISO cost that that Ameren Missouri is proposing be included in the FAC.

DR 8005 requests the major and minor account for each cost type. While the response does provide some additional information on the major and minor accounts for each cost type, it does not provide this information for all of the cost types. For example, the table on page LMB-1-7, states that sums billed by MISO or another seller of power for purchased power can be found in major accounts 555, 565, 575 and 924, but it does not list which MISO costs are recorded in which major account. Ameren Missouri also included in its response duplicates of the workpapers that it provided in its filing. These workpapers do give some additional information regarding major and minor accounts. However, it did not provide a corresponding major account for each of the MISO costs as detailed in its exemplar tariff.

Data request 8005 asked for the cost recorded in the test year in each major and minor account for each cost type. The response did include some costs for some of the accounts for the test year. However, the response did not include the test year cost for every cost type by every major and minor account. For example, cost of

coal commodity; applicable taxes; Btu adjustments; SO₂ hedges; railroad, truck and barge transportation; switching & demurring; railcar repair; railcar depreciation; oil hedge costs; commissions and fees; and oil that are all listed on Schedule LMB-1-6 as types of costs. Test year costs for each of these type costs were not included in the response to OPC DR 8005.

The data request response also did not include actual test year costs by the MISO schedules listed in the exemplar tariff sheet.

For these reasons OPC finds Ameren Missouri's response to data request 8005 incomplete.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

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CASE NO. ER-2014-0258

Requested from: Lynn Barnes

Requested by: Lena Mantle

Date Requested: September 17, 2014

Information Requested: Provide a complete explanation of all the revenues that Ameren Missouri includes in its FAC, the major and minor accounts each of these revenues are recorded in, the revenues recorded in the test year in each of these major and minor accounts, the revenue by major and minor account included in Ameren Missouri's Net Base Energy Cost shown in Laura Moore's Schedule LMM-17, and the line on Laura Moore's Schedule LMM-17 which contains the revenue.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

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CASE NO. ER-2014-0258

Requested from: Laura Moore

Requested by: Lena Mantle

Date Requested: October 20, 2014

Information Requested: Ameren Missouri's response to data request 8006 is incomplete. It did not provide all of the requested data and is therefore considered unresponsive and deficient. Data Request 8006 asks for a complete explanation of all of the revenues that Ameren Missouri is requesting flow through the FAC proposed in Lynn Barnes' direct testimony. Ameren Missouri, in its response to DR 8006, states a complete explanation of the revenues was provided in the MFRs included in Ms. Barnes' testimony. However, that is an incomplete list. For example, MISO schedules are listed as possible revenues flows in the exemplar tariff sheets. However, a description of these types of revenues and the particular MISO schedule of each revenue type are not found in the MFRs. In addition, the MFR states that "transmission service revenues received including revenues for system control and dispatch and reactive supply and voltage control, among others" would be included. Use of the phrase "...among others" is not a complete explanation of transmission revenues that Ameren Missouri is requesting be included.

Data request 8006 requests the major and minor account for each revenue type. While the response does provide some additional information on the major and minor accounts for each revenue type, it does not provide this information for all of the MISO revenues it detailed by MISO schedule in its exemplar tariff.

Data request 8006 asked for the revenues recorded in the test year in each major and minor account for each revenue type. The response did include some costs for some of the accounts for the test year. However, the response did not include the test year cost by revenue type that it lists and for every MISO schedule listed in the exemplar tariff sheets.

For these reasons OPC finds Ameren Missouri's response to data request 8006 incomplete.

The information provided to the Office of the Public Counsel in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform the Office of the Public Counsel if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date:

Prepared by: