

Exhibit No.:  
Issues: Union Electric Company  
d/b/a AmerenUE / Gascosage  
Exchange -- All  
Witness: John Greenlee  
Type of Exhibit: Surrebuttal Testimony  
Sponsoring Party: Gascosage Electric Cooperative  
Case No.: EO-2002-178  
Date Testimony Prepared: December 27, 2001

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. EO-2002-178**

**FILED<sup>3</sup>**

**DEC 27 2001**

**Surrebuttal Testimony**

**Missouri Public  
Service Commission**

**of**

**John Greenlee**

1           **Q.     Please state your name.**

2           A.     John Greenlee

3           **Q.     Are you the same John Greenlee who previously submitted direct testimony in**  
4 **this case?**

5           A.     Yes, I am.

6           **Q.     Have you reviewed the pre-filed Rebuttal Testimony of Missouri Public Service**  
7 **Commission Staff witness James L. Ketter in this case?**

8           A.     Yes, I have.

9           **Q.     Do you support Mr. Ketter's conclusion that the First Amended Territorial**  
10 **Agreement and Customer Exchange are in the public Interest?**

11          A.     Yes, I agree with his recommendation that the First Amendment to the Territorial  
12 Agreement and change of electric supplier is in the public interest and not detrimental to the public  
13 interest. During the Staff's review of the Application, it was pointed out to Mr. Ketter that the  
14 customer exchange would allow Gascosage and its G&T, Sho Me Electric Powere Cooperative to  
15 add a substation in the Brummley area and allow Gascosage to build a loop in its current north-  
16 western part of the service territroy. This loop feed will provide greater reliability to not only the  
17 customers being transferred to Gascosage, but also to Gascosage's existing customers living in this  
18 area.

19          Gascosage is very excited about the transfer because of the numerous engineerial  
20 enhancements to our distribution system.

21          **Q.     Do you have anything further to add?**

22          A.     Yes. Gascosage has spoken with several of the School District Superintendents  
23 about the tax impact of the proposed transfer. While Gascosage understands the concerns of the

1 Superintendents, the tax impact statement filed with the application is merely a snapshot of what the  
2 parties believe the impact of the transfer will have on the taxing districts. There is nothing  
3 prohibiting the schools or other entities from adjusting their tax rates, in accordance with propoer  
4 state law, to ensure that the taxing entity has sufficient receipts to meet its finicail obligations.  
5 Furthermore, the tax impact does not take into consideration the construction enhancements that  
6 Gascosage and Sho-Me Power Cooperative will undertake in this area. These improvements will  
7 increase the tax base, thus increaseing the tax obligation and the tax receipts. The same can be said  
8 for AmerenUE. As AmerenUE adds facilities and miles of line to its distribution system, that will  
9 be added to the tax base.

10 **Q. Have you reviewed the pre-filed Rebuttal Testimony of any OE Local 148 or**  
11 **IBEW Local 1455 witness ?**

12 A. No, I did not, since these unions have not filed any rebuttal testimony in this case.


13 **Q. Does this conclude your testimony?**

14 A. Yes, it does.

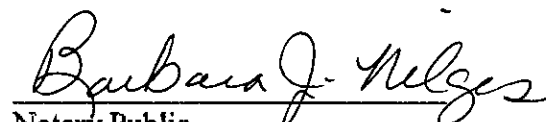
AFFIDAVIT OF JOHN GREENLEE

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF COLE     )

John Greenlee, of lawful age, on my oath states, that I have participated in the preparation of the foregoing testimony in question and answer form, consisting of 3 pages, to be presented in this case; that the answers in the foregoing testimony were given by me; that I have knowledge of the matters set forth in such answers; and that such matters are true to the best of my knowledge and belief.

  
John Greenlee

Subscribed and sworn to before me this 27<sup>th</sup> day of December,  
2001

  
Notary Public

My Commission Expires: 5/31/2004

