Exhibit No.: Issue: Witness: Type of Exhibit: Sponsoring Party: Case No.: Date Testimony Prepared:

Fuel Adjustment Clause Maurice Brubaker Direct Testimony MIEC EO-2010-0255 November 24, 2010

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

In the Matter of the First Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company, d/b/a AmerenUE

Case No. EO-2010-0255

Direct Testimony and Schedules of

**Maurice Brubaker** 

On behalf of

**Missouri Industrial Energy Consumers** 

### **REDACTED VERSION**

November 24, 2010 Project 9165



BRUBAKER & ASSOCIATES, INC. CHESTERFIELD, MO 63017

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

In the Matter of the First Prudence Review of Costs Subject to the Commission-Approved Fuel Adjustment Clause of Union Electric Company, d/b/a AmerenUE

)

)

Case No. EO-2010-0255

STATE OF MISSOURI

SS

COUNTY OF ST. LOUIS

### Affidavit of Maurice Brubaker

Maurice Brubaker, being first duly sworn, on his oath states:

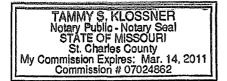
1. My name is Maurice Brubaker. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes is my direct testimony and schedules which were prepared in written form for introduction into evidence in the Missouri Public Service Commission's Case No. EO-2010-0255.

3. I hereby swear and affirm that the testimony and schedules are true and correct and that they show the matters and things that they purport to show. //

Maurice Brubaker

Subscribed and sworn to before me this 23<sup>rd</sup> day of November, 2010.



Notary Public

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

In the Matter of the First Prudence Review of ) Costs Subject to the Commission-Approved ) Fuel Adjustment Clause of Union Electric ) Company, d/b/a AmerenUE )

Case No. EO-2010-0255

### **Direct Testimony of Maurice Brubaker**

### 1 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

- 2 A Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,
- 3 Chesterfield, MO 63017.

### 4 Q WHAT IS YOUR OCCUPATION?

- 5 A I am a consultant in the field of public utility regulation and President of Brubaker &
- 6 Associates, Inc., energy, economic and regulatory consultants.

### 7 Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

8 A This information is included in Appendix A to my testimony.

### 9 Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

- 10 A I am appearing on behalf of the Missouri Industrial Energy Consumers ("MIEC").
- 11 MIEC member companies are large consumers of electricity and are materially
- 12 impacted by Ameren Missouri's ("AMMO") rates.

### 1 Q WHAT IS THE ISSUE IN THIS CASE?

A The basic issue is whether AMMO was correct in retaining the revenues, and
consequently the margins, from sales under two bilateral contracts with American
Electric Power Company ("AEP") and Wabash Valley Power Association, Inc.
("Wabash"), or whether the margins from these sales should have flowed through to
retail customers.

### 7 Q WHAT IS YOUR POSITION ON THIS ISSUE?

8 A My position is that in accordance with the terms of AMMO's Missouri PSC retail Fuel 9 Adjustment Clause ("FAC"), the margins from sales under these two bilateral 10 contracts should have been treated like other off-system sales and flowed through the 11 FAC to the benefit of retail customers.<sup>1</sup>

### 12 Q WHAT IS AMMO'S BASIS FOR CONTENDING THAT THE BENEFIT OF THE 13 MARGINS FROM THESE SALES SHOULD NOT BE FLOWED THROUGH TO 14 RATEPAYERS?

A AMMO maintains that they fall into the category of sales which may be excluded from off-system sales revenue ("OSSR") under the FAC. For reference, Sheet No. 98.3 to the FAC tariff effective March 1, 2009 is attached hereto as Schedule MEB-1. As stated in the tariff, all off-system sales flow through the FAC except "long-term full and partial requirements sales."

<sup>&</sup>lt;sup>1</sup>Excluding approximately 1.6% which properly is credited to the municipal wholesale customers who are bearing a proportionate share of AMMO's generation and transmission assets as a consequence of the jurisdictional allocation in Case No. ER-2008-0318 when the FAC tariff at issue was approved.

# 1 Q ARE THESE TWO BILATERAL CONTRACTS SHORT-TERM OR LONG-TERM 2 REQUIREMENTS CONTRACTS?

- No. The commonly understood concept of "requirements service" is, and for many 3 Α 4 years has been, the provision of power to municipal customers, and sometimes rural 5 electric cooperatives, on a basis whereby the selling utility incorporates the 6 requirements of these customers (who typically have little or no generation of their 7 own) into its resource planning. In fact, this is the definition provided by the Federal 8 Energy Regulatory Commission ("FERC") in the instructions to filling the data 9 requested on the "Sales for Resale" pages in the Form 1 report. Attached hereto as Schedule MEB-2, are pages 310-310.4, 311-311.4 and 450.1 (footnotes) from 10 11 AMMO's 2009 FERC Form 1 report. Sales for Resale are to be categorized as 12 Requirements Service ("RQ"), Long-Term Firm Service ("LF"), Intermediate Term 13 Firm Service ("IF"), Short-Term Firm Service ("SF"), Long-Term Unit Power Service 14 ("LU") or Intermediate Term Service from a designated generating unit ("IU").
- 15 FERC defines Requirements Service as:
- 16 Requirements service is service which the supplier plans to provide on 17 an ongoing basis (i.e., the supplier includes projected load for this 18 service in its system resource planning). In addition, the reliability of 19 requirements service must be the same as, or second only to, the 20 supplier's service to its own ultimate consumers.
- 21 Note that sales to the cities are designated as requirements service, while all 22 other sales are not. In fact, AMMO categorized the sales to AEP (page 310) and 23 Wabash (page 310.3) as "IF" – Intermediate Firm Service, and not as "RQ" – 24 Requirements Service.

### 1 Q ARE YOU AWARE OF ANY OTHER GENERALLY ACCEPTED SOURCES FOR

### 2 THE DEFINITION OF REQUIREMENTS SERVICE?

- A Yes. The Edison Electric Institute ("EEI"), a trade association for the investor-owned electric utility industry, publishes a "Glossary of Electric Industry Terms." I have attached as Schedule MEB-3 a copy of page 134 of that document which defines requirements service as:
- Requirements Service: Service that the supplier plans to provide on
  an ongoing basis (i.e., the supplier includes projected load for this
  service in its system resource planning). In addition, the reliability of
  requirements service must be the same as, or second only to, the
  supplier's service to its own ultimate customers.
- 12 This definition is the same as the definition included in the FERC Form 1, and
- 13 in his deposition Mr. Haro stated he did not disagree with it.<sup>2</sup>

### 14 Q BASED ON YOUR EXPERIENCE IN THE ELECTRIC UTILITY INDUSTRY, IS THIS

### 15 THE COMMONLY UNDERSTOOD MEANING OF "REQUIREMENTS SERVICE"?

16 A Yes, it is.

### 17 Q WHAT IS THE NATURE OF THE SERVICES PROVIDED TO AEP AND WABASH?

<sup>2</sup>Haro November 19, 2010 Deposition, pages 133-134.

1	***************************************	*****
2	***************************************	3

3	Q	HOW DOES THIS SERVICE DIFFER FROM THE SERVICE PROVIDED TO THE
4		MUNICIPAL CUSTOMERS?
5	А	***************************************
6		***************************************
7		***************************************
8		***************************************
9		***************************************
10		***************************************
11		***************************************
12		***************************************
13		**************************************
14	Q	HOW DO THE CONTRACT DURATIONS COMPARE TO THE DURATION OF
15		MUNICIPAL CONTRACTS?
16	А	***************************************
17		***************************************
18		***************************************
19		*******

<sup>3</sup>Haro November 19, 2010 Deposition, pages 137-138.

1QDOES THE FACT THAT THE CONFIRMATION LETTER WITH AEP STATES,2AMONG OTHER THINGS, THAT THE CAPACITY AND ENERGY PROVIDED WILL3"...ENABLE AEP TO PARTIALLY MEET LOAD SERVING REQUIREMENTS."4AND THAT THE AGREEMENT WITH WABASH STATES, AMONG OTHER5THINGS, THAT THE PRODUCT SHALL BE USED TO "...PARTIALLY MEET THE6REQUIREMENTS THE CITIZENS ELECTRIC CORPORATION IN MISSOURI..."7MAKE THESE AGREEMENTS REQUIREMENTS CONTRACTS?

8 No. These are incidental statements that have no meaning as to the character of the А 9 Given that AMMO was seeking contracts that could be service supplied. characterized as "long-term partial requirements" so as to qualify for exclusion from 10 flowing the margin through the FAC,<sup>4</sup> it is not surprising that some of these words 11 12 such as "load," "partially," and "requirements" would appear as incidental language in 13 these documents. Calling these transactions requirements service does not make 14 them so anymore than calling a dog a duck makes it quack. They are what they are, 15 and they are not requirements contracts.

### 16 Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

17 A Yes, it does.

<sup>&</sup>lt;sup>4</sup>Haro November 19, 2010 Deposition, page 139.

### **Qualifications of Maurice Brubaker**

1	Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	А	Maurice Brubaker. My business address is 16690 Swingley Ridge Road, Suite 140,
3		Chesterfield, MO 63017.
4	Q	PLEASE STATE YOUR OCCUPATION.
5	А	I am a consultant in the field of public utility regulation and President of the firm of
6		Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.
7	Q	PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND
8		EXPERIENCE.
9	А	I was graduated from the University of Missouri in 1965, with a Bachelor's Degree in
10		Electrical Engineering. Subsequent to graduation I was employed by the Utilities
11		Section of the Engineering and Technology Division of Esso Research and
12		Engineering Corporation of Morristown, New Jersey, a subsidiary of Standard Oil of
13		New Jersey.
14		In the Fall of 1965, I enrolled in the Graduate School of Business at
15		Washington University in St. Louis, Missouri. I was graduated in June of 1967 with
16		the Degree of Master of Business Administration. My major field was finance.
17		From March of 1966 until March of 1970, I was employed by Emerson Electric
18		Company in St. Louis. During this time I pursued the Degree of Master of Science in
19		Engineering at Washington University, which I received in June, 1970.
20		In March of 1970, I joined the firm of Drazen Associates, Inc., of St. Louis,
21		Missouri. Since that time I have been engaged in the preparation of numerous

1 studies relating to electric, gas, and water utilities. These studies have included analyses of the cost to serve various types of customers, the design of rates for utility 2 3 services, cost forecasts, cogeneration rates and determinations of rate base and 4 operating income. I have also addressed utility resource planning principles and 5 plans, reviewed capacity additions to determine whether or not they were used and 6 useful, addressed demand-side management issues independently and as part of 7 least cost planning, and have reviewed utility determinations of the need for capacity 8 additions and/or purchased power to determine the consistency of such plans with 9 least cost planning principles. I have also testified about the prudency of the actions 10 undertaken by utilities to meet the needs of their customers in the wholesale power 11 markets and have recommended disallowances of costs where such actions were 12 deemed imprudent.

I have testified before the Federal Energy Regulatory Commission ("FERC"),
various courts and legislatures, and the state regulatory commissions of Alabama,
Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia,
Guam, Hawaii, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Missouri,
Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania,
Rhode Island, South Carolina, South Dakota, Texas, Utah, Virginia, West Virginia,
Wisconsin and Wyoming.

The firm of Drazen-Brubaker & Associates, Inc. was incorporated in 1972 and assumed the utility rate and economic consulting activities of Drazen Associates, Inc., founded in 1937. In April, 1995 the firm of Brubaker & Associates, Inc. was formed. It includes most of the former DBA principals and staff. Our staff includes consultants with backgrounds in accounting, engineering, economics, mathematics, computer science and business.

> Appendix A Maurice Brubaker Page 2

Brubaker & Associates, Inc. and its predecessor firm has participated in over 700 major utility rate and other cases and statewide generic investigations before utility regulatory commissions in 40 states, involving electric, gas, water, and steam rates and other issues. Cases in which the firm has been involved have included more than 80 of the 100 largest electric utilities and over 30 gas distribution companies and pipelines.

7 An increasing portion of the firm's activities is concentrated in the areas of 8 competitive procurement. While the firm has always assisted its clients in negotiating 9 contracts for utility services in the regulated environment, increasingly there are 10 opportunities for certain customers to acquire power on a competitive basis from a 11 supplier other than its traditional electric utility. The firm assists clients in identifying 12 and evaluating purchased power options, conducts RFPs and negotiates with 13 suppliers for the acquisition and delivery of supplies. We have prepared option 14 studies and/or conducted RFPs for competitive acquisition of power supply for 15 industrial and other end-use customers throughout the Unites States and in Canada, 16 involving total needs in excess of 3,000 megawatts. The firm is also an associate 17 member of the Electric Reliability Council of Texas and a licensed electricity 18 aggregator in the State of Texas.

In addition to our main office in St. Louis, the firm has branch offices in
Phoenix, Arizona and Corpus Christi, Texas.

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Appendix A Maurice Brubaker Page 3

	MC	.P.S.C. SCHEDULI	E NO. 5	Original	SHEET NO.	98.3
с	ANCELLING MC	.P.S.C. SCHEDUU	E NO	Sagary and any second state of the second state of	SHEET NO.	
PLYING TO			MISSOURI SERV	VICE AREA		
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		costs price expen	, broker commi hedges, oil o ses, and rever	ed in commodity and issions and fees as costs, ash disposal nues and expenses a portfolio optimiza	ssociated with revenues and resulting from f	uel
		Numbe commo reser reven	r 547: natura dity, oil, tra vation charges wes and expensi	ng costs reflected al gas generation of ansportation, stora s, fuel losses, heo ses resulting from tfolio optimization	costs related to age, capacity lging costs, and fuel and	•
		b) Costs Expen		unt Number 518 (Nuc	lear Fuel	
	5 vc ( c e a rs f ( l g g r g g t t r s	55, 565, a nder MISO apacity ch 1) year, i ustomers a lectric op re insuran eplacement auk Plant) ase rates. other than evel refle urchased p ower will ecoveries ualifying rinciples. he date th his tariff eplacement hall be in	nd 575, exclud Schedules 10, arges for con- neurred to sup erations. Al- ce premiums in power insura- to the exten- changes in a changes in a changes in a changes in a changes in a be relation be reduced by (other than the as assets und Notwithstand te "TS" factor , the premiuma- power insura- cluded in this		cative fees aris and excluding in excess of one Missouri retail o Missouri retail tor "CPP" ber 924 for lating to the Ta re not reflected insurance premit c Plant) from th se or decrease a of purchased ent power insura he Taum Sauk Pla concurrently with provided for in elating to he Taum Sauk Pla	ing ing in in ince int) ith
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	A P r	merenUE Mi	ssouri jurisd ade to serve l	ictional generating Missouri retail log	g units, (2) pow	rer
	cates Add					

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ISSUED BY	Τ.	R.	Voss	President	돈	CEO	St.	Louis,	Missouri
	NAM	EOF	OFFICER	TITLE				ADD	RESS

Name of Respondent 20100427-8007 FERC PDF UNION ELECTRIC COMPANY	This Report Is: (Unoffic1束机) 文本石の強治40 (2) A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of2009/Q4
	SALES FOR RESALE (Account	nt 447)	

\_nter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.

3. In column (b), enter a Statistical Classification Code based on the original contractual terms and conditions of the service as follows: RQ - for requirements service. Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.

LF - for tong-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a footnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.

IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.

SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.

LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.

IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line	Name of Company or Public Authority	Statistical	FERC Rate	Average Monthly Billing	Actual Der	mand (MW)
No.	(Footnote Affiliations) (a)	Classifi- cation (b)	Schedule or Tariff Number (c)	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demand (e)	Average Monthly CP Deman (f)
	Requirements Service					
_	Centralia, MO	RQ	1	7		
3	Hannibal, MO	RQ	1	45		
4	Kahoka, MO	RQ	1	6		
5	Kirkwood, MO	RQ	1	36		
6	Marceline, MO	RQ	1	6	1211	10
7	Репту, МО	RQ	1	45	- Ter	
8					131	
9	VARIATION IN UNBILLED-	RQ				
10	1	5		1. All and the second sec	201 D	
11	American Electric Power Cooperative	IF	1			
12	American Electric Power Cooperative	SF	1			
13	Associated Electric	SF	1			
14	Arkansas Electric Cooperative Corp.	SF	1			
	Subtotal RQ			0	0	.0
	Subtotal non-RQ			0	0	0
	Total			0	0	0

20	e of Respondent 100427-8007 FERC PDF (Unoff DN ELECTRIC COMPANY	This Rep	port is: 14/n10/riginal10	Date of Re (Mo, Da, Y	(r)	Period of Report
UNK	ON ELECTRIC COMPANY	(2)	A Resubmission	04/19/2010		2009/Q4
			S FOR RESALE (Acc	ount 447)		
e the second sec	eport all sales for resale (i.e., sales to pu er exchanges during the year. Do not rep nergy, capacity, etc.) and any settlements hased Power schedule (Page 326-327). Inter the name of the purchaser in column ership interest or affiliation the responden to column (b), enter a Statistical Classifica- for requirements service. Requirements blier includes projected load for this service to same as, or second only to, the supplie for tong-term service. "Long-term" mean ons and is intended to remain reliable even third parties to maintain deliveries of LF ition of RQ service. For all transactions i est date that either buyer or setter can un for intermediate-term firm service. The s five years. for short-term firm service. Use this cate	rchasers oth port exchanges s for imbalan (a). Do not t has with the tion Code baservice is se er in its syste er's service to s five years en under adv service). The dentified as illaterally get ame as LF s	er than ultimate co es of electricity ( i.e iced exchanges on e abbreviate or trur e purchaser. ised on the original ervice which the su err resource plannir o its own ultimate c or Longer and "firm verse conditions (e. is category should LF, provide in a foc out of the contract ervice except that "	nsumers) transacter a, transactions involution this schedule. Power neate the name or un contractual terms a pplier plans to provi- ing). In addition, the consumers. " means that service g., the supplier must not be used for Lon- bet the termination. "intermediate-term"	ving a balancing of d ver exchanges must b se acronyms. Explain and conditions of the de on an ongoing ba reliability of requiren e cannot be interrupt at attempt to buy eme g-term firm service w on date of the contract means longer than o	lebits and credits be reported on the in in a footnote any service as follows: usis (i.e., the nents service must and for economic ergency energy which meets the ct defined as the one year but Less
LU - serv U -	year or less. for Long-term service from a designated ice, aside from transmission constraints, for intermediate-term service from a desig ger than one year but Less than five years	must match t gnated gener	the availability and	reliability of designation	ated unit.	요즘 것은 귀엽!
				**		
		01-1-1-1	FEDC Data	A	Actual Dor	mand (MMA()
	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classifi- cation	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual Der Average Monthly NCP Demand	mand (MW) Average Monthly CP Demand
		Classifi- cation (b)	Schedule or	Monthly Billing	Actual Der Average Monthly NCP Demand (e)	mand (MW) Average Monthly CP Demand (f)
lo.	(Footnote Affiliations)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Demand	Average Monthly CP Demand
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lo. 1 2	(Footnote Affiliations) (a) BP Energy Company Miscellaneous	Classifi- cation (b) SF	Schedule or Tariff Number (c) 1	Monthly Billing Demand (MW)	Average Monthly NCP Demand	Average Monthly CP Demand
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2 3 4 5 6 7 8 8 9 10 11 12 13	(Footnote Affiliations) (a) BP Energy Company Miscellaneous Cargill/Alliant, LLC CINERGY Services, Inc. Central Illinois Light Co. (Affiliate) Central IL Pub Serv Co. (Affiliate) Cobb Electric Citigroup Constellation Power Source, Inc. DTE Energy Trading, Inc. Eagle Energy Empire District Electric Endur Energy	Classifi- cation (b) SF SF SF SF SF SF SF SF SF SF SF SF SF	Schedule or Tariff Number (c) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Monthly Billing Demand (MW)	Average Monthly NCP Demand (e)	Average Monthly CP Demand
No. 1 2 3 4 5 6 7 8 9 10 11 12 13	(Footnote Affiliations) (a) BP Energy Company Miscellaneous Cargill/Alliant, LLC CINERGY Services, Inc. Central Illinois Light Co. (Affiliate) Central IL Pub Serv Co. (Affiliate) Cobb Electric Citigroup Constellation Power Source, Inc. DTE Energy Trading, Inc. Eagle Energy Empire District Electric Endur Energy Entergy Services	Classifi- cation (b) SF SF SF SF SF SF SF SF SF SF SF SF SF	Schedule or Tariff Number (c) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demand (e)	Average Monthly CP Demand
lo. 1 2 3 4 5 6 7 8 9 10 11 12 13	(Footnote Affiliations) (a) BP Energy Company Miscellaneous Cargill/Alliant, LLC CINERGY Services, Inc. Central Illinois Light Co. (Affiliate) Central IL Pub Serv Co. (Affiliate) Cobb Electric Citigroup Constellation Power Source, Inc. DTE Energy Trading, Inc. Eagle Energy Empire District Electric Endur Energy Entergy Services Subtotal RQ	Classifi- cation (b) SF SF SF SF SF SF SF SF SF SF SF SF SF	Schedule or Tariff Number (c) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demand (e)	Average Monthly CP Demand

Name of Respondent 20100427-8007 FERC PDF UNION ELECTRIC COMPANY	This Report Is: (Unoffic1和) 文本石の資産日の (2) A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of 2009/Q4
	SALES FOR RESALE (Accourt	nt 447)	

Report all sales for resale (i.e., sales to purchasers other than ultimate consumers) transacted on a settlement basis other than
power exchanges during the year. Do not report exchanges of electricity (i.e., transactions involving a balancing of debits and credits
energy, capacity, etc.) and any settlements for imbalanced exchanges on this schedule. Power exchanges must be reported on the
hased Power schedule (Page 326-327).

\_nter the name of the purchaser in column (a). Do note abbreviate or truncate the name or use acronyms. Explain in a footnote any ownership interest or affiliation the respondent has with the purchaser.

3. In column (b), enter a Statistical Classification Code based on the original contractual terms and conditions of the service as follows: RQ - for requirements service. Requirements service is service which the supplier plans to provide on an ongoing basis (i.e., the

supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate consumers.

LF - for tong-term service. "Long-term" means five years or Longer and "firm" means that service cannot be interrupted for economic reasons and is intended to remain reliable even under adverse conditions (e.g., the supplier must attempt to buy emergency energy from third parties to maintain deliveries of LF service). This category should not be used for Long-term firm service which meets the definition of RQ service. For all transactions identified as LF, provide in a foctnote the termination date of the contract defined as the earliest date that either buyer or setter can unilaterally get out of the contract.

IF - for intermediate-term firm service. The same as LF service except that "intermediate-term" means longer than one year but Less than five years.

SF - for short-term firm service. Use this category for all firm services where the duration of each period of commitment for service is one year or less.

LU - for Long-term service from a designated generating unit. "Long-term" means five years or Longer. The availability and reliability of service, aside from transmission constraints, must match the availability and reliability of designated unit.

IU - for intermediate-term service from a designated generating unit. The same as LU service except that "intermediate-term" means Longer than one year but Less than five years.

Line	Name of Company or Public Authority	Statistical	FERC Rate	Average Monthly Billing	Actual De	mand (MW)
No.	(Footnote Affiliations) (a)	Classifi- cation (b)	Schedule or Tariff Number (c)	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demand (e)	Average Monthly CP Deman (f)
	Integry's	SF	1		E Maria and	
- 2	Illinois Power Co. (Affiliate)	SF	1		- 104 M	The state
3	J. Aron	SF	1	-	- £- /	- e -
4	JP Morgan	SF	1-	C 14	.9 v.	
5	Kansas City Power & Light Co	SF	1		1. A.	and the state with the second se
6	LG&E Energy Marketing Inc.	SF	1		= 1.	10 C 844-
7	Midwest Independent System Operator	SF	1		2. 2	- 11 50, 1 25 - 21
8	Morgan Stanley Capital Group	SF	1		25/25.5	1. 1. 1. 1.
9	Next Era Energy	SF	1		Contraction of the second s	
10	NRG Power	SF	1		A gaps	
11	Omaha Public Power District	SF	1		1.2	
12	PJM Interconnection	SF	1			1
13	City of Perry	SF	1	A CONTRACTOR OF		
14	Rainbow Energy Marketing Corporation	SF	1			
	Subtotal RQ			C	0	0
	Subtotal non-RQ			C	0	0
	Total			0	0	0

Nam 20 UNI(	of Respondent 100427-8007 FERC PDF (Unoffi ON ELECTRIC COMPANY		and the second second filler resources and second the	Date of Rep (Mo, Da, Yr 04/19/2010	r) End of	Period of Report 2009/Q4
1. R pown for e Purc 2. E own 3. Ir RQ - supp be th LF - reas from defir earli IF - than SF - one LU - serv IU -	eport all sales for resale (i.e., sales to pur er exchanges during the year. Do not repor hergy, capacity, etc.) and any settlements hased Power schedule (Page 326-327). Inter the name of the purchaser in column ership interest or affiliation the respondent column (b), enter a Statistical Classificati for requirements service. Requirements lier includes projected load for this service e same as, or second only to, the supplie for tong-term service. "Long-term" means ons and is intended to remain reliable eve third parties to maintain deliveries of LF s ition of RQ service. For all transactions ic est date that either buyer or setter can uni for intermediate-term firm service. The sa five years. for short-term firm service. Use this category year or less. for Long-term service from a designated g ce, aside from transmission constraints, n or intermediate-term service from a designated g reads from transmission constraints, n	SALE SALE SALE SALE SALE SALE SALE SALE	S FOR RESALE (Account er than ultimate consur- es of electricity ( i.e., tra- iced exchanges on this the abbreviate or truncate e purchaser. ased on the original com- ervice which the suppli- em resource planning). o its own ultimate cons- or Longer and "firm" me verse conditions (e.g., t is category should not LF, provide in a footnot out of the contract. ervice except that "inte- irm services where the unit. "Long-term" mean the availability and relia	mers) transacted ansactions involves schedule. Power the the name or us ner plans to provide In addition, the sumers. eans that services the supplier must be used for Long te the termination ermediate-term" r duration of each as five years or Li-	d on a settlement bas ving a balancing of d er exchanges must b se acronyms. Explai nd conditions of the de on an ongoing bas reliability of requirem e cannot be interrupte t attempt to buy eme g-term firm service w n date of the contrac means longer than of a period of commitme onger. The availabil ted unit.	sis other than lebits and credits be reported on the in in a footnote any service as follows: sis (i.e., the nents service must ed for economic ergency energy which meets the ct defined as the ne year but Less ent for service is lity and reliability of
Line No.	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classifi- cation	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual Der Average Monthly NCP Demand	mand (MW) Average Monthly CP Demand
	(a)	(b)	(c)	(d)	(e)	(f)
1	Sempra Energy Trading Corporation	SF	1	, -	N-7	V/
2	Southern Company Services	SF	1			
3	Strategic Energy	SF	1			
4	Suez Energy Marketing	SF	1			
5	TransAlta Energy Marketing (US) Inc.	SF	1			
6	Tennessee Valley Authority	SF	1			
7	The Energy Authority	SF	1			
8	Tenaska Power Source	SF	1			
9	Wabash	IF)	1			
10	Westar Energy	SF	1			
11	Western Area Power Administration	SF	1			
-	Realized gains and losses on derivative	SF	1			
13	transactions					
14	Unrealized gains and losses on	OS				
	Subtotal RQ			0	0	0
	Subtotal non-RQ			0	0	0

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Name	of Respondent 100427-8007 FERC PDF (Unoff.	This Rep	port Is:	Date of F (Mo, Da,	Vr)	ar/Period of Report	1
UÑIO	N ELECTRIC COMPANY		A Resubmission	04/19/20		d of2009/Q4	
		SALE	S FOR RESALE (Acco	ount 447)			1
owe - en .r. .r. .n. .ln .Q - .uppl e the F - fu easo om t efinit arlie F - fu F - fu fo arlie F - fu basso om t e the F - fu basso om t e the F - fu basso out to f - fu f -	eport all sales for resale (i.e., sales to pur r exchanges during the year. Do not rep lergy, capacity, etc.) and any settlements hased Power schedule (Page 326-327). Inter the name of the purchaser in column rship interest or affiliation the responden column (b), enter a Statistical Classificat for requirements service. Requirements ier includes projected load for this servic e same as, or second only to, the supplie or tong-term service. "Long-term" means ins and is intended to remain reliable even third parties to maintain deliveries of LF section of RQ service. For all transactions is st date that either buyer or setter can un or intermediate-term firm service. The sective years. or short-term firm service. Use this category ear or less. or Long-term service from a designated per than one year but Less than five years.	rchasers oth port exchang s for imbalar (a). Do not t has with the tion Code ba service is s see in its syste er's service t s five years en under adv service). The dentified as ilaterally get ame as LF s gory for all fi generating un unust match is gore in the service is gore in a service is service is service is service is service is service is service is service is service is service is ser	her than ultimate cor es of electricity ( i.e. inced exchanges on the abbreviate or trun e purchaser. ased on the original ervice which the sup em resource plannin o its own ultimate co or Longer and "firm" verse conditions (e.g is category should r LF, provide in a fool out of the contract. ervice except that "i irm services where t unit. "Long-term" me the availability and r	nsumers) transactions , transactions inver- this schedule. Po- locate the name or contractual terms oplier plans to prov- g). In addition, the onsumers. ' means that serving , the supplier mu- not be used for Loo- thote the termination intermediate-term' he duration of each eans five years or eliability of design	olving a balancing of wer exchanges must use acronyms. Exp and conditions of the vide on an ongoing e reliability of requir ce cannot be interru- ust attempt to buy er ng-term firm service ion date of the contron- " means longer than ch period of committe Longer. The availa nated unit.	of debits and credits st be reported on the olain in a footnote any ne service as follows: basis (i.e., the rements service must upted for economic mergency energy which meets the ract defined as the n one year but Less ment for service is ibility and reliability of	
	Name of Company or Public Authority (Footnote Affiliations)	Statistical Classifi- cation	FERC Rate Schedule or Tariff Number	Average Monthly Billing Demand (MW)	Actual D Average Monthly NCP Dema	Demand (MW) Average nd Monthly CP Demand	
	(Footnote Affiliations) (a)	Classifi-		Monthly Billing	Actual D Average Monthly NCP Dema (e)	Pemand (MW) Average Monthly CP Demand (f)	
	(Footnote Affiliations)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3 4 5	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3 4 5 6	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3 4 5 6 7	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
). 3 4 5 6 7 8	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
). 3 4 5 6 7 8 9	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
0. 3 4 5 6 7 8 9 0	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
<ul> <li>a)</li> <li>b)</li> <li>b)</li> <li>c)</li> &lt;</ul>	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
<ul> <li>a)</li> <li>b)</li> <li>b)</li> <li>c)</li> &lt;</ul>	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
3       3       4       5       6       7       8       9       0       1       2       3	(Footnote Affiliations) (a)	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW)	Average Monthly NCP Dema	Average nd Monthly CP Demand	
0.       3       4       5       6       7       8       9       10       11       12       13       14	(Footnote Affiliations) (a) derivative transactions	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demai (e)	Average Monthly CP Demand (f)	
o. 3 4 5 6 7 8 9 10 11 12 13 14 5 5 6 7 8 9 10 11 12 13 14 5 5 5 6 7 8 9 9 10 10 10 10 10 10 10 10 10 10	(Footnote Affiliations) (a) derivative transactions	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demai (e)	Average Monthly CP Demand (f)	
4 5 6 7 8 9 10 11 12 13 14	(Footnote Affiliations) (a) derivative transactions	Classifi- cation	Schedule or Tariff Number	Monthly Billing Demand (MW) (d)	Average Monthly NCP Demai (e)	Average Monthly CP Demand (f)	

Name of Respondent 20100427-8007 FER UNION ELECTRIC COMPAN	(2)	Artesubinission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of	1 t.a
	SÁLES	FOR RESALE (Account 447)	(Continued)		
OS - for other service. use non-firm service regardless of the service in a footnote. AD - for Out-of-period adjus years. Provide an explanat 4. Group requirements RQ in column (a). The remaini "Total" in column (a) as the 5. In Column (c), identify th which service, as identified 6. For requirements RQ sa average monthly billing der monthly coincident peak (C demand in column (f). For metered hourly (60-minute integration) in which the su Footnote any demand not s 7. Report in column (g) the	this category only for thos of the Length of the contra- stment. Use this code for a sales together and report ng sales may then be lister Last Line of the schedule of in column (b), is provided. eles and any type of-service mand in column (d), the av P) all other types of service, of integration) demand in a n pplier's system reaches its stated on a megawatt basis e megawatt hours shown o	e services which cannot be act and service from design any accounting adjustments adjustment. them starting at line numbed d in any order. Enter "Subto . Report subtotals and total r Tariff Number. On separa e involving demand charges erage monthly non-coincide enter NA in columns (d), (e) nonth. Monthly CP demand monthly peak. Demand re s and explain. n bills rendered to the purch	placed in the above-defin- lated units of Less than on s or "true-ups" for service p er one. After listing all RQ otal-Non-RQ" in column (a l for columns (9) through (I te Lines, List all FERC rate s imposed on a monthly (o ent peak (NCP) demand in and (f). Monthly NCP der l is the metered demand d ported in columns (e) and maser.	e year. Describe the na provided in prior reporting sales, enter "Subtotal - I ) after this Listing. Enter () e schedules or tariffs und r Longer) basis, enter th column (e), and the ave mand is the maximum uring the hour (60-minut (f) must be in megawatt	ture g RQ" r der e rage e
<ol> <li>Report demand charges out-of-period adjustments, the total charge shown on t</li> <li>The data in column (g) t</li> <li>the Last -line of the schedu</li> <li>401, line 23. The "Subtotal</li> <li>401, line 24.</li> <li>Footnote entries as rec</li> </ol>	in column (j). Explain in a bills rendered to the purcha hrough (k) must be subtota le. The "Subtotal - RQ" ar I - Non-RQ" amount in colu	footnote all components of aser. aled based on the RQ/Non- nount in column (g) must be	the amount shown in colu RQ grouping (see instructi e reported as Requirement s Non-Requirements Sales	mn (j). Report in columr on 4), and then totaled c ts Sales For Resale on F	n
MegaWatt Hours	Demand Observes	REVENUE	Other Charges	Total (\$)	Line
Sold	Demand Charges (\$) (h)	Energy Charges (\$)	(\$)	(h+i+j)	No.
(g)	(h)	(i)	(j)	(k)	
3,258	38,214	69,645		107,859	
25,109	249,242	494,997		744,239	3
22,615	31,452	1,314,202		1,345,654	4
212,328	197,399	15,799,589		15,996,988	
31,428	35,468	1,879,215		1,914,683	5
9,706		570,838		570,838	
					8
-27,453		-593,000		-593,000	and the second
					10
734,400		23,537,520		23,537,520	11
18,747	413,628	593,607		1,007,235	
47,372		1,480,816	÷.	1,480,816	
24,178		957,609		957,609	14
276,991	551,775	19,535,486	0	20,087,261	
13,687,217	8,892,225	358,494,676	71,188,223	438,575,124	
13,964,208		the second se	and the second se		

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Name of Respondent 20100427-8007 FERC PDF UNION ELECTRIC COMPANY	This Report Is: (Unoffici柔山) 文本石の強化の (2) A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of
	SALES FOR RESALE (Account 447)	(Continued)	

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature <sup>s</sup> the service in a footnote.

for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting *s*. Provide an explanation in a footnote for each adjustment.

4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)

5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.

6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)

demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.

7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.

8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.

9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401, line 24.

10. Footnote entries as required and provide explanations following all required data.

Lin	Total (\$)		MegaWatt Hours		
No	(h+i+j) (k)	Other Charges (\$) (j)	Energy Charges (\$) (i)	Demand Charges (\$) (h)	Sold (g)
	340,320		303,920	36,400	9,600
	-447,857	-447,857			1.4
	4,916,781		4,916,781		136,880
	3,095,000		3,095,000		adi 1
	475,102	31,038	5.	444,064	
	934,646	71,946	54 <sup>100</sup> 1	862,700	
	758,650		758,650	1 S	20,750
	20,475		20,475	1	585
	1,785,000		660,000	1,125,000	17,600
1	473,000		1. 1. 1.	473,000	1
1	1,702,925		1,663,925	39,000	45,867
1	334,913		334,913	H	9,824
1	206,800		206,800		5,600
1	2,167,322		2,167,322		62,816
	20,087,261	0	19,535,486	551,775	276,991
-	438,575,124	71,188,223	358,494,676	8,892,225	13,687,217
	458,662,385	71,188,223	378,030,162	9,444,000	13,964,208

Name of Respondent 20100427-8007 FERC UNION ELECTRIC COMPANY	PDF (Unoffici和)	Report Is:	Date of Report (Mo, Da, Yr)	Year/Period of Report End of 2009/Q4	•
UNION ELECTRIC COMPANY	(2)	AResubilission	04/19/2010		
				, 	
DS - for other service. use t on-firm service regardless of f the service in a footnote. D - for Out-of-period adjust ears. Provide an explanatio . Group requirements RQ so noolumn (a). The remaining Total" in column (a) as the L . In Column (c), identify the thich service, as identified in . For requirements RQ sale verage monthly billing demonthly coincident peak (CP emand in column (f). For a netered hourly (60-minute in the total charge shown on bi . Report in column (g) the . Report demand charges i ut-of-period adjustments, in the total charge shown on bi . The data in column (g) the Last -line of the schedule 01, line 23. The "Subtotal - 01, line 24.	his category only for those of the Length of the contra- ment. Use this code for a sales together and report g sales may then be listed ast Line of the schedule. ast Line of the schedule or n column (b), is provided. es and any type of-service and in column (d), the ave and the types of service, et all other types of service, et and on a megawatt basis megawatt hours shown or in column (h), energy chain a column (j). Explain in a take a column (j) the subtota a column (k) must be subtota be the "Subtotal - RQ" amount in column a column (k) and the subtota column (k) and	act and service from design any accounting adjustments adjustment. them starting at line number d in any order. Enter "Subto Report subtotals and total Tariff Number. On separate e involving demand charges erage monthly non-coincide enter NA in columns (d), (e) nonth. Monthly CP demand monthly peak. Demand re- s and explain. n bills rendered to the purch rges in column (i), and the to footnote all components of iser. aled based on the RQ/Non- hount in column (g) must be mn (g) must be reported as	placed in the above-define ated units of Less than one or "true-ups" for service p or one. After listing all RQ is otal-Non-RQ" in column (a) for columns (9) through (k te Lines, List all FERC rate is imposed on a monthly (or nt peak (NCP) demand in and (f). Monthly NCP den is the metered demand du ported in columns (e) and haser. total of any other types of of the amount shown in colur RQ grouping (see instruction e reported as Requirement Non-Requirements Sales	e year. Describe the na rovided in prior reporting sales, enter "Subtotal - F after this Listing. Enter ) e schedules or tariffs und Clonger) basis, enter the column (e), and the ave nand is the maximum uring the hour (60-minut (f) must be in megawatts charges, including nn (j). Report in column on 4), and then totaled o s Sales For Resale on F	ture g RQ" r der e rage e s. (k) on
0. Footnote entries as requ MegaWatt Hours Sold	Demand Charges	REVENUE Energy Charges	Other Charges (\$)	Total (\$) (h+i+j)	Line No.
(g)	(\$) (h)	(\$) (i)	()	(k)	
	1,252,500			1,252,500	
1	1,310,403		97,470	1,407,873	_
44,034		1,414,392		1,414,392	
46,400	and the second	1,685,200		1,685,200	-
335,506		11,589,397		11,589,397	
35,202		1,017,285		1 6 1 7 6 6 7	-
10,884,457		004 707 447	0.400.000	1,017,285	6
102,400		261,707,117	9,128,236	270,835,353	6
	76.000	261,707,117 3,175,800	9,128,236	270,835,353 3,175,800	6 7 8
122 063	76,000	3,175,800	9,128,236	270,835,353 3,175,800 76,000	6 7 8 9
122,063	76,000	3,175,800 3,379,429	9,128,236	270,835,353 3,175,800 76,000 3,379,429	6 7 8 9 10
39,798	76,000	3,175,800 3,379,429 1,881,100		270,835,353 3,175,800 76,000 3,379,429 1,881,100	6 7 8 9 10 11
	76,000	3,175,800 3,379,429 1,881,100 6,968,533	9,128,236	270,835,353 3,175,800 76,000 3,379,429 1,881,100 6,941,153	6 7 8 9 10 11 11
39,798 189,269	76,000	3,175,800 3,379,429 1,881,100 6,968,533 16,028		270,835,353 3,175,800 76,000 3,379,429 1,881,100 6,941,153 16,028	6 7 8 9 10 11 12 13
39,798	76,000	3,175,800 3,379,429 1,881,100 6,968,533		270,835,353 3,175,800 76,000 3,379,429 1,881,100 6,941,153	6 7 8 9 10 11 12 13
39,798 189,269 4,761 276,991	551,775	3,175,800 3,379,429 1,881,100 6,968,533 16,028 199,928 199,928	-27,380	270,835,353 3,175,800 76,000 3,379,429 1,881,100 6,941,153 16,028 199,928 20,087,261	6 7 8 9 10 11 12 13
39,798 189,269 4,761		3,175,800 3,379,429 1,881,100 6,968,533 16,028 199,928	-27,380	270,835,353 3,175,800 76,000 3,379,429 1,881,100 6,941,153 16,028 199,928	6 7 8 9 10 11 12 13

Name of Respondent 20100427-8007 FERC PDF UNION ELECTRIC COMPANY	This Report Is: (Unoffic1和)) 文本石の宿田の (2) 〇AResubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of
	SALES FOR RESALE (Account 447)	(Continued)	

OS - for other service. use this category only for those services which cannot be placed in the above-defined categories, such as all non-firm service regardless of the Length of the contract and service from designated units of Less than one year. Describe the nature the service in a footnote.

for Out-of-period adjustment. Use this code for any accounting adjustments or "true-ups" for service provided in prior reporting
 s. Provide an explanation in a footnote for each adjustment.

4. Group requirements RQ sales together and report them starting at line number one. After listing all RQ sales, enter "Subtotal - RQ" in column (a). The remaining sales may then be listed in any order. Enter "Subtotal-Non-RQ" in column (a) after this Listing. Enter "Total" in column (a) as the Last Line of the schedule. Report subtotals and total for columns (9) through (k)

5. In Column (c), identify the FERC Rate Schedule or Tariff Number. On separate Lines, List all FERC rate schedules or tariffs under which service, as identified in column (b), is provided.

6. For requirements RQ sales and any type of-service involving demand charges imposed on a monthly (or Longer) basis, enter the average monthly billing demand in column (d), the average monthly non-coincident peak (NCP) demand in column (e), and the average monthly coincident peak (CP)

demand in column (f). For all other types of service, enter NA in columns (d), (e) and (f). Monthly NCP demand is the maximum metered hourly (60-minute integration) demand in a month. Monthly CP demand is the metered demand during the hour (60-minute integration) in which the supplier's system reaches its monthly peak. Demand reported in columns (e) and (f) must be in megawatts. Footnote any demand not stated on a megawatt basis and explain.

7. Report in column (g) the megawatt hours shown on bills rendered to the purchaser.

8. Report demand charges in column (h), energy charges in column (i), and the total of any other types of charges, including out-of-period adjustments, in column (j). Explain in a footnote all components of the amount shown in column (j). Report in column (k) the total charge shown on bills rendered to the purchaser.

9. The data in column (g) through (k) must be subtotaled based on the RQ/Non-RQ grouping (see instruction 4), and then totaled on the Last -line of the schedule. The "Subtotal - RQ" amount in column (g) must be reported as Requirements Sales For Resale on Page 401, line 23. The "Subtotal - Non-RQ" amount in column (g) must be reported as Non-Requirements Sales For Resale on Page 401, line 24.

10. Footnote entries as required and provide explanations following all required data.

Line	Total (\$)	- 18 · ·	REVENUE		MegaWatt Hours	
No.	Total (\$) (h+i+j) (k)	Energy Charges Other Charges (\$) (\$) (i) (j)		Demand Charges (\$) (h)	Sold (g)	
	2,449,830			2,449,830		
	2,136,429		2,136,429		63,782	
	408,950			408,950		
	750			750		
	-11,470		-11,470			
	2,165,572		2,165,572		66,574	
	-25,028		-25,028		-588	
	228,206		228,206		6,183	
	16,482,560		16,482,560		505,600	
1	3,754,610		3,754,610		106,707	
1	32,250		32,250		850	
1:	62,334,770	62,334,770				
-						
14	11 11					
	20,087,261	0	19,535,486	551,775	276,991	
	438,575,124	71,188,223	358,494,676	8,892,225	13,687,217	
	458,662,385	71,188,223	378,030,162	9,444,000	13,964,208	

UNION ELECTRIC COMPANY	C PDF (Unofficiat) Y (2)	s Report Is: ) X4An1OrigitA10 A Resubmission	Date of Report (Mo, Da, Yr) 04/19/2010	Year/Period of Report End of2009/Q4	
	SÁLES	FOR RESALE (Account 447)	(Continued)		
OS - for other service. use non-firm service regardless of the service in a footnote, AD - for Out-of-period adjus years. Provide an explanat 4. Group requirements RQ in column (a). The remainin "Total" in column (a) as the 5. In Column (c), identify th which service, as identified 6. For requirements RQ sa average monthly billing den monthly coincident peak (C demand in column (f). For metered hourly (60-minute integration) in which the sup Footnote any demand not s 7. Report in column (g) the 8. Report demand charges out-of-period adjustments, i the total charge shown on t 9. The data in column (g) t the Last -line of the schedu 401, line 23. The "Subtotal 401,line 24.	SALES solutions in a footnote for each is sof the Length of the contra- stment. Use this code for a tion in a footnote for each is sales together and report ng sales may then be liste a Last Line of the schedule of in column (b), is provided ales and any type of-servic mand in column (d), the av CP) all other types of service, in integration) demand in a m pplier's system reaches its stated on a megawatt basis a megawatt hours shown of in column (h), energy cha in column (h), energy cha in column (j). Explain in a bills rendered to the purcha- through (k) must be subtot ale. The "Subtotal - RQ" ar I - Non-RQ" amount in column	FOR RESALE (Account 447) ( se services which cannot be ract and service from design any accounting adjustments adjustment. them starting at line numbe d in any order. Enter "Subto be race involving demand charges rerage monthly non-coincide enter NA in columns (d), (e) nonth. Monthly CP demand s monthly peak. Demand rep s and explain. on bills rendered to the purch arges in column (i), and the t footnote all components of aser. aled based on the RQ/Non-F mount in column (g) must be umn (g) must be reported as	(Continued) placed in the above-define ated units of Less than on- e or "true-ups" for service p er one. After listing all RQ otal-Non-RQ" in column (a) for columns (9) through (k te Lines, List all FERC rate is imposed on a monthly (or int peak (NCP) demand in and (f). Monthly NCP der is the metered demand di ported in columns (e) and haser. total of any other types of of the amount shown in colur RQ grouping (see instructi e reported as Requirements Non-Requirements Sales	ed categories, such as a e year. Describe the na provided in prior reporting sales, enter "Subtotal - F ) after this Listing. Enter () a schedules or tariffs und r Longer) basis, enter the column (e), and the ave mand is the maximum uring the hour (60-minut (f) must be in megawatts charges, including mn (j). Report in column on 4), and then totaled of s Sales For Resale on F	ture g RQ" der e rage e s. (k)
	quired and provide explana	ations following all required o	data.		1
MegaWatt Hours Sold	Demand Charges (\$) (h)	REVENUE Energy Charges (\$) (i)	Other Charges (\$)	Total (\$) (h+i+j)	Line No.
(g)	(n)	()	(j)	(k)	1
					2
					4
					3
					3
					4
					4
					4 5 6
					4 5 6 7
	-				4 5 6 7 8
4.14 + A.(100.00)	-				4 5 6 7 8 9
5 T + 3 (1000)					4 5 6 7 8 9 10
4 17 a. d. (1990), (1990)					4 5 6 7 8 9 10 11
					4 5 6 7 8 9 10 11 11
4 14					4 5 6 7 8 9 10 11 12 13
4 19					4 5 6 7 8 9 10 11 11
1 H + A + H +					4 5 6 7 8 9 10 11 12 13
5	551.775		0	20,087,261	4 5 6 7 8 9 10 11 12 13
276,991 13,687,217	551,775 8,892,225	19,535,486 358,494,676	0 71,188,223		4 5 6 7 8 9 10 11 12 13

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## 20100427-8007 FERC PDF (Unofficial) 04/19/2010

Name of Respondent		21 A. A. E	This Repor (1) X An Or		Date of Report (Mo, Da, Yr)	Year/Period of Repor
UNION ELECTRIC COMPA	NY		(2) A Res		04/19/2010	2009/Q4
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制的正常的问题			Sec.			
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Schedule Page: 310.1	Line No.: 2	Column: j	· · · · · · · · · · · · · · · · · · ·			
Amount represents Broker						
Schedule Page: 310.1	Line No.: 5	Column: j				
Amount represents ancillia	ry services.					4
Schedule Page: 310.1	Line No.: 6	Column: j				2
Amount represents ancillia	ry services.				1.1.2.10.2.22	2
Schedule Page: 310.2	Line No.: 2	Column: j				
Amount represents ancillia	ry services.	5-150.5 <sup>7</sup> 0-55				
Schedule Page: 310.2	Line No.: 7	Column: j				
Regulation & Frequency R Spinning Reserve Service Supplemental Reserve Serv Total	vice	\$	2,790,636 2,160,676 <u>658,679</u> 9,128,236	at Juli	$\frac{1}{2} \frac{1}{1} \frac{1}$	
Schedule Page: 310.2	Line No.: 12	Column: j				
Amount represents PJM Lo Schedule Page: 310.3	Line No.: 12	Column: j				
Represents gains and losses			a p physical de	livery of norman	and broker fees	1
Schedule Page: 310.3	Line No.: 14	Column: j	g a physical de	invery of power	and bloker lees.	
A total of \$3,012,991 has b			this page Thi	amount repres	cents unrealized and	ne and losses on
lerivatives designated as he						
I REAL				ing physical		. ooduired.

Page 450.1

**Renewable Resources** Any source of energy that is continually available or that can be renewed or replaced. Examples include wind, solar, geothermal, hydro, photovoltaic, wood and waste. Nonrenewable energy sources include coal, oil, and gas, that all exist in finite amounts.

**Replacement Cost** An estimate of the cost to replace the existing facilities either as currently structured or as redesigned to embrace new technology with facilities that will perform the same functions. This method recognizes the benefits of presently available technology in replacing the system. For example, a number of small generating units may be replaced with a single large unit at lower unit costs and greater efficiency. See also *Reproduction Cost*.

**Replacement Power** Power that a utility must purchase when one of its own plants (or other long-term suppliers) experiences an outage or is otherwise unavailable.

**Replacements** The substitution of a unit of Utility Plant for another unit generally of a like or improved character.

**Repowering** A means of increasing the output and efficiency of conventional thermal generating facilities. For example, adding combustion turbines to supplement or replace steam from fuel combustion used to power steam turbines.

#### Reprocessing See Recycling.

**Reproduction Cost** The estimated cost to reproduce existing properties in their current form and capability at current cost levels. The mechanics may involve a trending of the original cost dollars to reflect current costing factors, or they may involve a property appraisal accompanied by estimates to reconstruct the facilities. The former is most often utilized as Rate Base.

**Repurchase Agreements (Repo)** A means of temporarily adding to monetary reserves. The Fed buys government securities under a contract to sell them back at an agreed price and date. Generally repurchase agreements mature within one to seven days (maximum is 15 days). Dealers may usually repurchase before the maturity of the agreement if they wish. Interest rate is determined by auction.

**Requirements Service** Service that the supplier plans to provide on an ongoing basis (i.e., the supplier includes projected load for this service in its system resource planning). In addition, the reliability of requirements service must be the same as, or second only to, the supplier's service to its own ultimate customers.

**Rerating** A change in the capability of a generator due to a change in conditions such as age, upgrades, auxiliary equipment, cooling, etc.

**Reregulation** The design and implementation of regulatory practices to be applied to the remaining regulated entities after restructuring of the vertically-integrated electric utility. The remaining regulated entities would be those that continue to exhibit characteristics of a natural monopoly, where imperfections in the market prevent the realization of more competitive results, and where, in light of other policy considerations, competitive results are unsatisfactory in one or more respects. Regulation could employ the same of different regulatory practices as those used before restructuring.

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Schedule MEB-4 is Highly Confidential and has been removed in its entirety. Schedule MEB-5 is Highly Confidential and has been removed in its entirety.