

Exhibit No.:
Issues: Fuel and Purchased Power
Witness: David W. Elliott
Sponsoring Party: MO PSC Staff
Type of Exhibit: Rebuttal Testimony
File No.: ER-2011-0028
Date Testimony Prepared: March 25, 2011

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

DAVID W. ELLIOTT

**UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI**

FILE NO. ER-2011-0028

*Jefferson City, Missouri
March 2011*

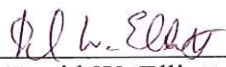
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a AmerenUE's Tariff to Increase Its)
Annual Revenues for Electric Service) File No. ER-2011-0028

AFFIDAVIT OF DAVID W. ELLIOTT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

David W. Elliott, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 2 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



David W. Elliott

Subscribed and sworn to before me this 24th day of March, 2011.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086



Notary Public

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **DAVID W. ELLIOTT**

4 **UNION ELECTRIC COMPANY**
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13 Q. Please state your name.

14 A. David W. Elliott.

15 Q. Are you the same David W. Elliott that contributed to Staff's Cost of Service
16 Report previously filed in this case?

17 A. Yes, I am.

18 Q. What is the purpose of your rebuttal testimony?

19 A. The purpose of my rebuttal testimony is to provide the Staff's updated
20 production cost simulation results reflecting the use of 2010 unit operating data to calculate
21 normalize inputs to the production cost model, and the revised market prices.

22 Q. What are the results of Staff's revised production cost simulations?

23 A. The results indicate that the appropriate level of annual fuel and purchased
24 power cost for Ameren Missouri is \$456,029,583 with off-system sales, and \$633,536,008
25 without off-system sales. This is an increase of \$11,601,873 (2.6%) for fuel cost with off-
26 system sales and a decrease of \$537,136 (0.085%) without off-system sales for fuel cost from
27 Staff's direct filing.

28 Q. What production cost model inputs were affected?

Rebuttal Testimony of
David W. Elliott

1 A. The planned maintenance hours, the forced outage factors, and the unit
2 capacities.

3 Q. What period of data did you use?

4 A. I used the six years of unit operating data ending December 31, 2010, which
5 replaced the six years of operating data ending December 31, 2009.

6 Q. What was the update to the market prices?

7 A. Staff witness, Erin L. Maloney describes the update to market prices in her
8 rebuttal testimony.

9 Q. Does this conclude your rebuttal testimony?

10 A. Yes, it does.