

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. EO-2014-0009, Application of Union Electric Company d/b/a/
Ameren Missouri for Authority to Sell or Transfer a Portion of its Franchise,
Works or System to FormPak, Inc.

FROM: Lisa K. Hanneken, Auditing Unit
Alan J. Bax, Energy Unit – Engineering Analysis

/s/Daniel I. Beck 11/13/13 /s/ Steven Dottheim 11/13/13
Energy Analysis Section / Date Staff Counsel's Office / Date

SUBJECT: Staff Report

DATE: November 13, 2013

On July 8, 2013, Union Electric Company d/b/a/ Ameren Missouri (“Ameren Missouri”) filed an Application with the Missouri Public Service Commission (“Commission”) requesting authorization to sell a transformer with Serial Number MFH-1994 at 355 Paul Avenue, St. Louis/Ferguson, Missouri 63135 to FormPak, Inc. (“FormPak”). On July 9, 2013, the Commission issued an Order for the Staff to file a recommendation in File No. EO-2014-0009 no later than August 9, 2013. On August 9, 2013, Ameren Missouri filed a Notice of Voluntary Dismissal of Application with no explanation respecting the voluntary dismissal. Commission Rule 4 CSR 240-2.116(1) permits the applicant to dismiss its application without leave of the Commission or consent of all parties, if no prepared testimony has been filed or evidence offered. Later, on August 9, 2013, the Commission issued a Notice of Dismissal. This occurred before the Staff had an opportunity to make a filing. Due to the state of the information regarding the transformer in question, this Missouri Public Service Commission Staff (“Staff”) report is being filed to provide for the Commission’s records at least as much information of which the Staff is aware regarding what has occurred concerning the transformer in question, which is the subject of not only File No. EO-2014-0009, but also Case No. EO-2005-0369.

Previously, in Case No. EO-2005-0369, on June 16, 2005, the Commission, by *Order Granting Application To Sell Asset*, authorized the sale of the transformer with Serial Number MFH-1994 located at 355 Paul Avenue to Behnen’s Container Service (“Behnen”), the customer then at this address. Staff is not aware of what transpired between Union Electric Company d/b/a/ AmerenUE (“AmerenUE”) and Behnen subsequent to June 16, 2005, i.e., Staff is neither aware of whether a sale actually occurred between AmerenUE and Behnen, nor is Staff aware of whether a sale did not occur between AmerenUE and Behnen. Nothing in EFIS¹ gives any indication.

When Ameren Missouri first indicated in July 2013 that it planned to voluntarily dismiss its Application with no explanation, counsel for Staff related that Staff thought that there should be in the Commission’s records information regarding what had transpired concerning the sale of

¹ EFIS (“Electronic Filing and Information System”): the electronic storage system for much of the Commission’s official public records.

transformer with Serial Number MFH-1994 given the presence in EFIS of Case No. EO-2005-0369, which was established by AmerenUE's filing in 2005 requesting Commission authorization to sell a transformer at 355 Paul Avenue, St. Louis/Ferguson, Missouri 63135 with Serial Number MFH-1994 to Behnen and the presence in EFIS of File No. EO-2014-0009, which was established by Ameren Missouri's filing in 2013 requesting Commission authorization to sell the same transformer with Serial Number MFH-1994 to FormPak, Inc. Staff believes that an indication of the resolution of the transfer of the transformer should appear in the Commission's records, given that there are two cases in EFIS regarding the transformer in question, neither of which presently provides that information. Ameren Missouri decided to address the matter of the transformer at 355 Paul Avenue, St. Louis/Ferguson, Missouri 63135 with Serial Number MFH-1994 by offering to FormPak, and FormPak accepting, an agreement which (a) terminates lease charges for the transformer, (b) quitclaim transfers the transformer at no cost, and (c) transfers responsibility for future maintenance, repair, and replacement of the transformer; and then filed to voluntarily dismiss File No. EO-2014-0009.

Due to there having been a previously filed case, EO-2005-0369, in addition to the recent EO-2014-0009, certain members of the Commission's Tariff, Safety, Economic and Engineering Analysis Department and Audits, Accounting and Financial Analysis Department had contacted Ameren Missouri in 2005 and 2013 and obtained information to process each of these cases. Also, even before Ameren Missouri filed its Application in File No. EO-2014-0009 on July 8, 2013, the present customer at 355 Paul Avenue, FormPak, made an informal complaint to the Commission's Consumer Services Unit on April 1, 2013, regarding its unsuccessful effort, since its initiation of service with Ameren Missouri in August 2011, at 355 Paul Avenue, to purchase the transformer at that location from Ameren Missouri. Consequently, a Consumer Services Unit Specialist contacted Ameren Missouri. On April 2, 2013, Ameren Missouri advised the Consumer Services Unit Specialist that on January 22, 2013, FormPak made a request to Ameren Missouri about purchasing the transformer. Ameren Missouri related that it was calculating a sale price for the transformer and it anticipated having the sale price for presentation to FormPak by the end of the month, April 2013. The Consumer Services Unit Specialist sent a letter to FormPak setting out the material matters that both FormPak and Ameren Missouri had stated. FormPak had no further contact with the Consumer Services Unit.

As previously noted, Ameren Missouri filed an Application on July 8, 2013, establishing File No. EO-2014-0009, seeking Commission approval of the sale of the transformer with Serial Number MFH-1994 to FormPak. In performing its analysis of Ameren Missouri's Application in File No. EO-2014-0009 in July 2013, Staff was provided additional information concerning FormPak's earlier efforts to purchase the transformer. Evidently, on September 22, 2011, Ameren Missouri quoted to FormPak a price of ** _____ ** for the sale of the transformer, and FormPak countered with an offer of ** _____ **. Ameren Missouri indicated to Staff that the initial activity between Ameren Missouri and FormPak regarding a sale of the transformer in question stopped at that point.

The Application and Appendices² of Ameren Missouri, filed on July 8, 2013 to obtain authorization to sell the transformer at 355 Paul Avenue to FormPak, contains the following information, some of which is not internally consistent:

- Request to sell a 750 kVA transformer to FormPak, pursuant to Section 393.190.1 and 4 CSR 240-3.110 - Application
- Transformer has Serial Number MFH-1994 - Appendices B and E to Application
- FormPak agrees to pay \$6,215.96, the depreciated net book value of the facilities as of the date of the parties' agreement - first sentence of paragraph 9 at page 3 of the Application
- Since 1985 FormPak has rented a 750 kVA three-phase transformer at FormPak's warehouse at 355 Paul Ave. in St. Louis - first sentence of paragraph 6 at page 2 of the Application
- Monthly rate of rental of transformer with Serial Number MFH-1994 of \$289.15 since 1985 - Appendix B
- 750 kVA transformer install year 1985 – priced for sale to FormPak as of March 19, 2013: net book determined \$6,215.96 – also alternate reproduction cost from the asset management system determined and reproduction cost and reproduction cost depreciated determined – Appendix C
- One-page Transformer Rental Agreement filed as Appendix B to the Application shows in writing on the upper portion of the document “Paul Ave LLC” as the “Customer” located at “355 Paul Ave.” The lower portion of the same document shows in writing “Unidynamics” as the “Customer.” The lower portion of the Transformer Rental Agreement indicates in writing that it was executed on “June 7, 1985.” Printed on the bottom left-hand side of the document is the line “*FORM 3869 REV. 7/91.” Written on the bottom left-hand side of the document is the line “Per Jennifer Lozano 1/20/10.” The Transformer Rental Agreement also states in printing and writing that the transformer in question “Serial No. MFH-1994” will be available at Union Electric Company's warehouse at “12121 Dorsett, Maryland Heights, MO” - Appendix B

When Staff began working on File No. EO-2014-0009, it believed it recalled a prior transformer sale case involving the same 355 Paul Avenue address. Staff identified the prior case as EO-2005-0369. Staff reviewed Case No. EO-2005-0369, which was filed by AmerenUE on April 15, 2005. In the application in Case No. EO-2005-0369, AmerenUE sought to sell a 750 kVA transformer to Behnen, at Behnen's request, at the Behnen place of business, 355 Paul Avenue, St. Louis/Ferguson, Missouri 63135. The April 15, 2005 application contained an unexecuted Bill of Sale and, in part, the following information:

- Application pursuant to Section 393.190 and 4 CSR 240-3.110 – “Comes Now” clause of application

² Appendices to July 8, 2013 Application in File No. EO-2014-0009: Appendix A - Picture of Transformer; Appendix B - Transformer Rental Agreement; Appendix C - Pricing of Sale of Facilities to FormPak; Appendix D - Bill of Sale (Unexecuted); Appendix E – Secretary's Certificate.

- Request to sell a 750 kV transformer - second sentence of paragraph 3 at page 2 of the application
- Address of customer seeking to purchase the transformer is 355 Paul Avenue, Ferguson, Missouri – first sentence of paragraph 3 at page 2 of the application
- Serial Number MFH-1994 of 750 kVA transformer to be sold - unexecuted Bill of Sale (Appendix 1)
- Behnen agrees to pay \$5,439.70 - first sentence of paragraph 4 at page 2 of the application and also the unexecuted Bill of Sale (Appendix 1)
- Behnen had previously been leasing this transformer - second sentence of paragraph 3 at page 2 of the application
- Sale will not be detrimental to the public interest and no other customer's service will be adversely affected - paragraph 7 at page 3 of the application

On June 10, 2005, Staff filed its memorandum recommendation in Case No. EO-2005-0369, which states that no other customer is served off this transformer, or is affected by the transaction. Staff recommended that the request to sell the transformer should be granted by the Commission. Subsequently, on June 16, 2005, the Commission issued an *Order Granting Application To Sell Asset* authorizing the sale of this transformer to Behnen. As stated earlier, Staff is not aware of what subsequently transpired between AmerenUE and Behnen, and there is nothing in EFIS that gives any indication. There is nothing in EFIS in Case No. EO-2005-0369 after the *Order Granting Application To Sell Asset*.

Staff was told in July 2013 by Ameren Missouri that Staff's raising the previous request to sell the transformer by AmerenUE in Case No. EO-2005-0369 was causing Ameren Missouri to review its records relating to the transformer's ownership. Staff also was told by Ameren Missouri that as a result of internal AmerenUE audits performed in 2009 by each of AmerenUE's districts, rents for certain transformers that were not being charged at the time of the audits were subsequently commenced being charged. An Ameren Account Activity Statement for 355 Paul Avenue obtained by Staff from Ameren Missouri for the period commencing 02/15/07 and going forward to 08/24/11, the period when the customer Paul Avenue, LLC, was at the address 355 Paul Avenue, does not show a Transformer Rental charge until the Transaction Date 02/04/10 for the Billing Period commencing 01/05/10. A final bill is shown for the customer Paul Avenue, LLC for the date 08/10/11 and a payment date is shown of 08/24/11.

Ameren Missouri notified Staff in August 2013 that it could not determine from its records whether it had actually made a sale of the transformer to Behnen. On August 2, 2013, counsel for Ameren Missouri related that Ameren Missouri had reached a decision to: terminate lease charges for the transformer to FormPak; issue a quitclaim document to transfer the transformer to FormPak at no cost and make FormPak responsible for future maintenance, repair, and replacement of the transformer; and voluntarily dismiss File No. EO-2014-0009 with no explanation. Staff confirmed that Ameren Missouri made this proposal to FormPak and that FormPak was satisfied with it in a subsequent conversation with FormPak. Staff told Ameren Missouri that it did not have concerns with how Ameren Missouri was indicating it intended to

proceed; however, Staff advised that it intended to make a filing with the Commission to indicate what had transpired with the transformer in question.

On August 9, 2013, Ameren Missouri filed a Notice of Voluntary Dismissal of Application. Subsequently, on August 9, 2013, the Commission filed a Notice of Dismissal. On August 21, 2013, Staff Counsel was copied with the quitclaim document, dated August 8, 2013, containing the terms of transfer of said transformer to FormPak, Inc.

Although Staff is no longer required to file a recommendation due to the dismissal of File No. EO-2014-0009, Staff is providing this informational filing to document what is known regarding the requests to transfer this transformer to Behnen in Case No. EO-2005-0369 and FormPak in File No. EO-2014-0009.

Below is a limited history of the ownership of the 355 Paul Avenue property:

- International Match operated on the 355 Paul Avenue property in the 1960's and 1970's as an industrial customer
- Unidynamics operated on the 355 Paul Avenue property in the 1980's as an industrial customer
- Apex Industries, Inc. and PSM Manufacturing owned the 355 Paul Avenue property in the 1990's as an industrial customer
- Behnen purchased the 355 Paul Avenue property in April 2004
 - Trash container business, not industrial customer
 - Three transformers at the site rented by the preceding owners from AmerenUE – Behnen returned the 500 kVA and 50 kVA transformers and cancelled the corresponding rental agreements in January 2005
 - Behnen began discussing the possibility of purchasing the 750 kVA transformer with AmerenUE in January 2005
 - Order granting sale of transformer (Serial Number MFH-1994) was issued by Commission on June 16, 2005 for \$5,439.70, the transformer's book value
 - Behnen's Container Service, Inc. filed Articles of Dissolution by Voluntary Action with the Missouri Secretary of State on December 30, 2010 effective December 31, 2010 and a Certificate of Termination for Behnen's Container Service, Inc. to exist as a corporation under the General and Business Corporation Law of the State of Missouri was issued by the Secretary of State on December 30, 2010 effective December 31, 2010
- IESI purchased the 355 Paul Avenue property in November 2006
- Paul Avenue, LLC purchased the 355 Paul Avenue property in January 2007
 - Original lease agreement for 750 kVA transformer Serial Number MFH-1994 dated June 7, 1985 was reinstated by Ameren Missouri on January 20, 2010
 - Rental payments of \$289.15 per month commenced to be paid by Paul Avenue, LLC
- FormPak purchased the 355 Paul Avenue property in August 2011
 - FormPak assumed the \$289.15 per month lease payments that Ameren Missouri was charging for the 750 kVA transformer

- FormPak soon contacted Ameren Missouri regarding purchasing the transformer
- File No. EO-2014-0009 requesting authorization of sale of transformer (Serial Number MFH-1994) to FormPak for \$6,215.96 filed July 8, 2013

See workpapers

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ALCT# 696000-04155

Prem # 696000461
TRANSFORMER RENTAL AGREEMENT

In consideration of the mutual agreements herein stated, Union Electric Company ("Company") hereby agrees to rent and to make available to Mut Ave LLC ("Customer"), located at 355 Paul Ave, City of St. Louis, State of Missouri, the standard service transformer described below. Transformer will be available at Company's warehouse located at 12121 Dorsett, City of Maryland Heights State of Missouri, and Customer agrees to transport and install and maintain on Customer's premises.

No. Units	Kva	Phase	Primary	Secondary	Serial No.
<u>1</u>	<u>750</u>	<u>3</u>	<u>4160</u>	<u>240</u>	<u>MFH-1994-289.15</u>

Customer hereby agrees to all of the covenants and agreements stated herein, and to pay Company monthly as rent for said transformer(s) the sum of two hundred eighty-nine and 15/100 Dollars (\$ 289.15). The parties expressly agree that in December of every calendar year the rent shall be changed, either upward or downward, to the Company's then existing rental charge for similar transformers.

The rented transformer(s) shall be under the control of and shall be operated and maintained by the Customer. Customer agrees that he shall be responsible for and shall comply with any and all applicable environmental and other legal requirements while the transformers are under his control and/or operation, including the transport by Customer of transformers to and from Company's warehouse.

Customer agrees to indemnify, save harmless and defend Company from and against any and all liabilities, claims, penalties, forfeitures, suits and the costs and expenses incident thereto (including costs of defense, settlement and reasonable attorneys' fees), which Company may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations or orders, caused, in whole or in part, by (i) Customer's breach of any term or provision of this Agreement, or (ii) any negligent or willfull act or omission of Customer, his employees or agents in the performance of this Agreement.

This Agreement shall become effective when the transformer(s) is received by Customer or his agent, or under special conditions on JUNE 7, 1985, and shall continue from month to month unless terminated by either party giving at least ten days' advance written notice to the other until said transformer(s) is returned to Company's warehouse.

Company retains title to and ownership of the transformer(s) covered by this Agreement. Customer shall not pledge, hypothecate, or grant any security interest in said transformer(s). Customer shall not assign its rights under this Agreement, without the prior written consent of Company. Prior to termination of this Agreement, Customer shall return the transformer(s) to Company's warehouse, in the same condition as received, except for normal wear and tear. Customer agrees to pay additional costs of any repairs due to occurrences beyond normal wear and tear.

This Agreement shall be binding upon the parties hereto and their successors and assigns.

IN WITNESS WHEREOF, Customer has duly executed this Agreement, this 7th day of JUNE, 1985.

Unidynamics

Customer

By L. Workman

Title _____



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

File Number:

00295355

Date Filed: 12/30/2010

Effective Date: 12/31/2010

Robin Carnahan

Secretary of State

Articles of Dissolution by Voluntary Action

(Submit with filing fee of \$25.00)

The undersigned corporation, for the purpose of dissolving the corporation, and pursuant to the provisions of The General and Business Corporation Law of Missouri, hereby executes the following Articles of Dissolution:

1. The Corporation's name is Behnen's Container Service, Inc. Charter #: 00295355

2. The dissolution was authorized on: 12/30/10
(Must be dissolved by a 2/3 vote of outstanding shares entitled to vote.) month/day/year

3. The following shareholder voting occurred:

(If voting by class or series of stock is required, information must be provided for each class or series):

A. Number of votes (outstanding shares entitled to vote) for dissolution by class was:

Class/Series	Number entitled to vote
<u>Voting Common</u>	<u>62,000</u>

B. Complete either i or ii (skip if C is used).

i. Number of votes cast for and against dissolution were:

Class/Series	For	Against
<u></u>	<u></u>	<u></u>

or ii. Number of undisputed votes cast for dissolution was sufficient for approval, and was:

Class/Series	Number voted
<u></u>	<u></u>

C. (Skip if B was used) The dissolution was approved by written consent of all shareholders. (Outstanding shares entitled to vote.)
Check here for "Yes" ☐

4. The effective date of this document is the date it is filed by the Secretary of State of Missouri unless a future date is otherwise indicated:
12/31/10

(Date may not be more than 90 days after the filing date in this office)

In Affirmation thereof, the facts stated above are true and correct.

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

Robert C. Behnen President 12/30/10
Authorized Signature Printed Name Title Date

Name and address to return filed document:

Name:

Address:

City, State, and Zip Code:

State of Missouri
With/Term/Dissolve - General Business 1 Page(s)



T1100301001



Office of the Secretary of State
State of Missouri

ROBIN CARNAHAN
SECRETARY OF STATE

Jefferson City
65101

CORPORATIONS DIVISION
(866) 223-6535 TOLL FREE

December 30, 2010

Effective Date: December 31, 2010

Walsh, Connie B.
Bryan Cave LLP, 211 N. Broadway Ste 3600
St. Louis, MO 63102

RE: BEHNEN'S CONTAINER SERVICE, INC.
00295355

Dear Corporation:

We have received the Articles of Voluntary Dissolution for the above-mentioned corporation and have filed them in our office.

We have received the Request for Termination and are pleased to issue a Certificate of Termination for the corporation.

Secretary of State
Business Services Division
P. O. Box 778
Jefferson City, MO 65102
(866) 223-6535
www.sos.mo.gov



State of Missouri
Robin Carnahan, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

File Number:

00295355

Date Filed: 12/30/2010

Effective Date: 12/31/2010

Robin Carnahan

Secretary of State

Request for Termination

(Submit with filing fee of \$25.00 and Certificate of Tax Clearance issued by the Missouri Department of Revenue)

The undersigned corporation, for the purpose of termination, hereby executes the following Request for Termination.

Article 1. Name of Corporation is Behnen's Container Service, Inc Charter #: 00295355

Article 2. On 12/30/10, the corporation filed Articles of Dissolution with the Secretary of State.
month/day/year

Article 3. The corporation has disposed of all claims against it or filed against it pursuant to 351.478 and 351.482.

Article 4. All the remaining assets have been distributed among the corporation's shareholders, in accordance with their respective rights and interests.

Article 5. The effective date of this document is the date it is filed by the Secretary of State of Missouri unless a future date is otherwise indicated: 12/31/10

(Date may not be more than 90 days after the filing date in this office.)

In Affirmation thereof, the facts stated above are true and correct.

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

Authorized Signature

Printed Name

Title

Date

State of Missouri
With/Term/Dissolve - General Business 2 Page(s)



T1100301002

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

Corp. 47 (09/2010)

TAXATION DIVISION
P O BOX 3666
JEFFERSON CITY MO 65105-3666



Missouri
DEPARTMENT OF REVENUE

Telephone: (573) 751-9268
Fax: (573) 522-1265
E-mail: taxclearance@dor.mo.gov

CERTIFICATE OF TAX CLEARANCE

BEHNEN'S CONTAINER SERVICE INC
576 RIVERVIEW DR
LABADIE MO 63055

DATE: DECEMBER 30, 2010

MISSOURI CORPORATION CHARTER NUMBER: 00295355

Thank you for contacting the Missouri Department of Revenue. In response to the corporation's request, a review of the tax records has been completed. All taxes owed, including all liabilities owed as determined by the Division of Employment Security, pursuant to Chapter 288, RSMo, have been paid.

This statement is not to be construed as limiting the authority of the Director of Revenue to pursue collection of liabilities resulting from final litigation, default in payment of any installment agreement entered into with the Director of Revenue, any successor liability that may become due in the future, or audits or reviews of the taxpayer's records as provided by law.

This Certificate of Tax Clearance must be presented to the Missouri Secretary of State's Office with any required paperwork and payment. For information concerning the Secretary of State's requirements, you may call their office at (573) 751-4153 or toll free at (866) 223-6535.

If you require additional information or assistance, please contact the Taxation Division at Post Office Box 3666, Jefferson City, Missouri 65105-3666 or by telephone at (573) 751-9268 during the hours of 8:00 a.m. to 5:00 p.m.

THIS CERTIFICATE REMAINS VALID FOR SIXTY (60) DAYS FROM THE ISSUANCE DATE. If you do not complete your transaction in sixty (60) days you must obtain a new Certificate of Tax Clearance. Additionally, a new Form 943, Request for Tax Clearance, may be required.

Sincerely,

A handwritten signature in cursive script that reads "Dwayne Maples".

Dwayne Maples
Administrator, Business Tax
Taxation Division

SL:DU0306

CBN001
201036400300603

STATE OF MISSOURI



Robin Carnahan
Secretary of State

CERTIFICATE OF TERMINATION

WHEREAS, a Request for Termination of

BEHNEN'S CONTAINER SERVICE, INC.
00295355

a corporation organized and existing under the General and Business Corporation Law, has been received, found to conform to law, and filed.

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, issue this Certificate of Termination of the aforementioned corporation, certifying that the existence of said corporation has this date ceased.

IN TESTIMONY WHEREOF, I hereunto
set my hand and cause to be affixed the
GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, this
30th day of December, 2010.

Effective Date: December 31, 2010

Robin Carnahan
Secretary of State



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

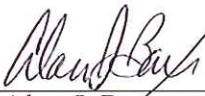
In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Authority to Sell or Transfer a Portion of)
its Franchise, Works, or System to FormPak,)
Inc.)
)

Case No. EO-2014-0009

AFFIDAVIT OF ALAN J. BAX

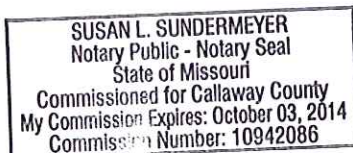
STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Alan J. Bax, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was given by him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Alan J. Bax

Subscribed and sworn to before me this 13th day of November, 2013.





Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Authority to Sell or Transfer a Portion)
of its Franchise, Works, or System to)
FormPak, Inc.)

File No. EO-2014-0009

AFFIDAVIT OF LISA K. HANNEKEN

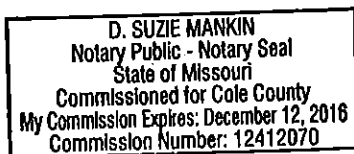
STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

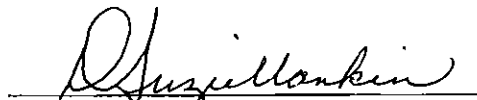
Lisa K. Hanneken, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was developed by her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of her knowledge and belief.



LISA K. HANNEKEN

Subscribed and sworn to before me this 13th day of November, 2013.





Notary Public