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Exhibit No.:
Issue: Revenue Allocation
Witness/Type of Exhibit: Chriss/Rebuttal
Sponsoring Party: Midwest Energy Users Association
Case No. ER-2010-0036

REBUTTAL TESTIMONY

OF

STEVE W. CHRISS

Submitted on Behalf of
Midwest Energy Users Association

UNION ELECTRIC COMPANY D/B/A AMERENUE

Case No. ER-2010-0036

February 11, 2010

MEUA Exhibit No. 550
Date 3-25-10 Reporter KF
File No ER-2010-0036

AFFIDAVIT OF STEVE W. CHRISS
FOR CASE NO. ER-2010-0036

STATE OF ARKANSAS §

COUNTY OF BENTON §

Steve W. Chriss, being duly sworn on oath, says that he is the person identified in the foregoing prepared direct testimony and exhibits; and that such testimony and exhibits were prepared by or under the direct supervision of said person; that such answers and/or information appearing therein are true and correct to the best of his knowledge and belief; and if asked the questions appearing therein, his answers would, under oath, be the same.

Steve W. Chriss

Subscribed and Sworn to me on this 11th day of February 2010.

Amber S. Girdley

My Commission Expires July 7, 2013

Amber S. Girdley
NOTARY PUBLIC
Benton County, Arkansas
My Commission Expires 7/7/2013

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville, AR 72716-0550. I am Manager, State Rate Proceedings, for Wal-Mart Stores, Inc.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?

A. I am testifying on behalf of the Midwest Energy Users Association ("MEUA").

Q. PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.

A. In 2001, I completed a Masters of Science in Agricultural Economics at Louisiana State University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My duties included research and analysis on domestic and international energy and regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties included appearing as a witness for PUC Staff in electric, natural gas, and telecommunications dockets. I joined the energy department at Walmart in July 2007. My Witness Qualifications Statement is found on Exhibit SWC-1.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION ("THE COMMISSION")?

A. No.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE REGULATORY COMMISSIONS?

A. Yes. I have submitted testimony before utility regulatory commissions in Arkansas, Colorado, Delaware, Indiana, Louisiana, Nevada, New Mexico, Oklahoma, Oregon, South Carolina, Utah, and Virginia on dockets regarding cost of service and rate design, qualifying facility rates, telecommunications deregulation, resource certification, energy efficiency/demand side management, fuel cost adjustment mechanisms, and the collection of cash earnings on construction work in progress.

Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN MISSOURI.

A. Walmart operates 135 stores and 3 distribution centers in Missouri, and employs 42,626 Missourians. In FYE 2009, Walmart purchased $7.1 billion worth of goods and services from Missouri-based suppliers, supporting 99,810 supplier jobs. *See* Exhibit SWC-2.

Q. IS WALMART A LARGE CUSTOMER OF AMEREN UE ("AMEREN" OR "THE COMPANY")?

A. Yes. Walmart has 55 facilities in Ameren's territory, including Walmart Supercenters and Discount Stores, Sam's Clubs, and a distribution center.

Q. HAVE YOU PREPARED EXHIBITS?

A. Yes. I have prepared Exhibit SWC-1, consisting of four pages, Exhibit SWC-2, consisting of two pages, and Exhibit SWC-3, consisting of one page.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address issues related to revenue allocation, responding specifically to the direct testimonies of Maurice Brubaker on behalf of Missouri Industrial Energy Consumers ("MIEC"), Ryan Kind on behalf of the Office of Public Counsel ("OPC"), and Michael S. Scheperle on behalf of the Missouri Public Service Commission Utility Operations Division ("Staff") and the revised direct testimony of Maurice Brubaker.

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A. My recommendations are as follows:

1) Significant movement towards cost of service should be a revenue allocation goal of the Commission in this docket;

2) MEUA does not propose the adoption of a particular cost of service study;

3) The Commission should, however, reject the OPC and Staff revenue allocation proposals because they do not represent any movement towards cost of service;

4) The Commission should adopt MIEC's 20 percent revenue neutral adjustment with any overall change in revenues applied on an equal percentage change after the adjustment is made;

5) The Commission should reject MIEC's proposed LTS revenue responsibility shift that would move LTS to cost of service; and

6) The Commission should reject MIEC's proposal to establish a rate level for LTS independent of the amount of the overall revenue increase and without regard to the results of a particular cost of service study.

Q. GENERALLY, SHOULD RATES BE SET BASED ON THE UTILITY'S COST OF SERVICE?

A. Yes. Rates should be set based on the utility's cost of service. This produces equitable rates that reflect cost causation, send proper price signals, and minimize price distortions.

Q. HAVE SEVERAL INTERVENORS SUBMITTED COST OF SERVICE STUDIES IN THIS DOCKET?

A. Yes. MIEC, Staff, and OPC all submitted cost of service studies in this docket in response to the cost study initially submitted by Ameren.

Q. DO THE SUBMITTED COST OF SERVICE STUDIES PRODUCE GENERALLY CONSISTENT RESULTS?

A. Not necessarily. However, all of the submitted studies show that schedules LGS and SP are currently paying rates that are above Ameren's cost of service, which is also consistent with Ameren's original cost study. *See* Revised Schedule MEB-COS-5, Kind Direct Attachment A, Missouri Public Service Commission Staff's Class Cost-of-Service and Rate Design Report, page 2, lines 9 through 11, and Schedule WMW-E1.

Q. BY WHAT AMOUNT ARE SCHEDULES LGS AND SP CURRENTLY PAYING RATES THAT ARE ABOVE THEIR COST OF SERVICE?

A. The amount by which schedules LGS and SP are currently paying rates that are above their cost of service ranges from $22.8 million to $84.6 million depending on the cost study. *See* Exhibit SWC-3.

Q. DOES MEUA PROPOSE THE ADOPTION OF A PARTICULAR COST OF SERVICE STUDY?

A. No.

Q. WHAT IS OPC'S REVENUE ALLOCATION RECOMMENDATION?

A. OPC recommends that any overall revenue requirement increase be implemented on an equal percentage basis. *See* Direct Testimony of Ryan Kind, page 8, lines 7 through 11.

Q. DO YOU RECOMMEND THE ADOPTION OF THE OPC REVENUE ALLOCATION RECOMMENDATION?

A. No. The OPC proposal makes no attempt to move the customer classes closer to cost of service and, as Mr. Brubaker points out in his testimony, maintains the status quo of significant over- and under-collections. *See* Direct Testimony of Maurice Brubaker, page 35, lines 18 to 20.

Q. WHAT IS STAFF'S REVENUE ALLOCATION RECOMMENDATION?

A. Staff recommends that the LGS class receive, on a revenue neutral basis, a reduction of $3 million revenue responsibility and that the RES class receive a $3 million increase in revenue responsibility. After the revenue neutral shift, Staff recommends that an equal percentage increase of 10.68 percent, which is Staff's overall revenue increase recommendation, be applied to each class. *See* Direct Testimony of Michael S. Scheperle, page 3, lines 15 to 20.

Q. DO YOU RECOMMEND THE ADOPTION OF THE STAFF REVENUE ALLOCATION RECOMMENDATION?

A. No. Given the severity of the revenue over-collection in Staff's cost of service model for LGS and SP, the proposed shift may not make a significant difference in moving classes towards cost of service.

Q. WHAT IS MIEC'S REVENUE ALLOCATION RECOMMENDATION?

A. MIEC proposes a two-step revenue allocation. First, MIEC proposes that a revenue neutral adjustment that would move each class roughly 20

percent of the way toward cost of service and then apply the overall change in revenue allowed on an equal percentage basis. *See* Direct Testimony of Maurice Brubaker, page 36, lines 3 to 14.

Q. DOES MEUA OPPOSE THE IMPLEMENTATION OF THIS PORTION OF THE MIEC RECOMMENDATION?

A. No. The 20 percent revenue neutral adjustment provides a reasonable balance between significant movement towards cost of service and the associated rate impacts to each customer class.

Q. SHOULD A 20 PERCENT REVENUE NEUTRAL ADJUSTMENT BE UTILIZED REGARDLESS OF THE APPROVED COST OF SERVICE MODEL IN THIS DOCKET?

A. Yes. While there are differences between the proposed cost of service studies put forth by the parties to this docket, each study shows that rates for several classes do not reflect cost of service. Significant movement towards cost of service should be a revenue allocation goal in this docket regardless of the approved model.

Q. WHAT IS THE SECOND PART OF MIEC'S REVENUE ALLOCATION RECOMMENDATION?

A. MIEC recommends that schedule LTS, which consists of only one customer, be moved all the way to cost of service, with the resulting revenue deficiency shouldered by the other rate classes. *See* Direct Testimony of Maurice Brubaker, page 37, lines 2 to 6.

Q. HOW MUCH REVENUE RESPONSIBILITY WOULD BE SHIFTED TO OTHER CLASSES UNDER MIEC'S RECOMMENDATION?

A. The shift in revenue responsibility, at present rates, is approximately $17.3 million. *See* Revised Schedule MEB-COS-6. Additionally, MIEC's proposal would result in the one LTS customer receiving a significant rate decrease at the same time all other customers are facing a significant rate increase. See Schedule MEB-COS-7, pages 1 to 4.

Q. SHOULD THE COMMISSION APPROVE THE LTS REVENUE RESPONSIBILITY SHIFT?

A. No. Reducing the rates of one customer to the financial detriment of all other rate classes results in rates that are not equitable, especially for rate classes such as LGS and SP, who are commercial and industrial customers that are already paying rates that are up to $84 million, or almost 13 percent, above cost of service. *See* Revised Schedule MEB-COS-5.

Q. IS THERE AN ASPECT OF THE SECOND PART OF MIEC'S LTS REVENUE RESPONSIBILITY SHIFT RECOMMENDATION THAT NEEDS CLARIFICATION?

A. Yes. The cost of service studies in this docket proposed by Ameren, OPC, and Staff all state that schedule LTS is currently under-recovering its cost of service. *See* Schedule WMW-E1, Kind Direct Attachment A, and Schedules MSS-1 and MSS-2. MIEC's proposal is unclear whether

schedule LTS should be moved to cost of service regardless of the approved cost of service model in this docket.

Q. DOES MIEC PROPOSE ANOTHER REVENUE ALLOCATION OPTION IN THEIR REVISED DIRECT TESTIMONY?

A. Yes. MIEC proposes to establish a rate level for LTS independent of the amount of overall revenue increase and without regard to the results of a particular cost of service study. *See* Revised Direct Testimony of Maurice E. Brubaker, page 38, line 8 to page 39, line 3.

Q. DOES MIEC PROVIDE AN EXAMPLE OF THE RESULTS OF THE PROPOSED INDEPENDENT ESTABLISHMENT OF THE LTS RATE LEVEL?

A. Yes. MIEC provides an example illustration at an overall revenue requirement increase of $200 million. At this level of overall increase, MIEC proposes that LTS receive a revenue decrease of $28.2 million, which would result in a revenue requirement of $111 million for the class. *See* Revised Schedule MEB-COS-9.

Q. HAS MR. BRUBAKER CALCULATED THE REVENUE REQUIREMENT FOR LTS WERE THE SCHEDULE TO BE MOVED TO COST OF SERVICE AT AN INCREASE OF $200 MILLION?

A. Yes. Mr. Brubaker has calculated that, at an overall revenue requirement increase of $200 million, setting the LTS revenue requirement at the cost

of service would result in a revenue requirement of $128.1 million. *See* Revised Schedule MEB-COS-7, page 3.

Q. COMPARING THE TWO SCENARIOS ABOVE, IS MIEC PROPOSING A RATE FOR LTS THAT IS BELOW THE SCHEDULE'S COST OF SERVICE?

A. Yes. MIEC's proposal to independently establish the rate level for LTS, at an overall revenue requirement increase of $200 million, would result in a rate that is below cost of service, with LTS underpaying, as calculated by Mr. Brubaker, by $17.1 million, or 13 percent.

Q. SHOULD THE COMMISSION APPROVE MIEC'S PROPOSAL TO INDEPENDENTLY ESTABLISH THE RATE LEVEL FOR LTS?

A. No. As I stated above, reducing the rates of one customer to the financial detriment of all other rate classes results in rates that are not equitable. Additionally, the Commission need look no further than Mr. Brubaker's own testimony, in which he states:

> **"Q PLEASE EXPLAIN HOW EQUITY IS ACHIEVED BY BASING RATES ON COST.**
>
> A. When rates are based on cost, each customer pays what it costs the utility to provide service to that customer; no more and no less. If rates are based on anything other than cost factors, then some customers will pay the costs attributable to providing service to other customers – which is inherently

inequitable." *See* Revised Direct Testimony of Maurice E. Brubaker, page 33, lines 1 to 5.

Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION FOR REVENUE ALLOCATION IN THIS DOCKET?

A. The Commission should reject MIEC's proposed LTS revenue responsibility shift as well as MIEC's proposal to establish a rate level for LTS independent of the amount of the overall revenue increase and without regard to the results of a particular cost of service study. The Commission should reject the OPC and Staff revenue allocation proposals and, in the alternative, adopt MIEC's 20 percent revenue neutral adjustment with any overall change in revenues applied on an equal percentage change after the adjustment is made.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Steve W. Chriss

Manager, State Rate Proceedings
Wal-Mart Stores, Inc.
Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550
Business Phone: (479) 204-1594

EXPERIENCE

July 2007 – Present
Wal-Mart Stores, Inc., Bentonville, AR
Manager, State Rate Proceedings

June 2003 – July 2007
Public Utility Commission of Oregon, Salem, OR
Senior Utility Analyst (February 2006 – July 2007)
Economist (June 2003 – February 2006)

January 2003 - May 2003
North Harris College, Houston, TX
Adjunct Instructor, Microeconomics

June 2001 - March 2003
Econ One Research, Inc., Houston, TX
Senior Analyst (October 2002 – March 2003)
Analyst (June 2001 – October 2002)

EDUCATION

2001	**Louisiana State University**	M.S., Agricultural Economics
1997-1998	**University of Florida**	Graduate Coursework, Agricultural Education and Communication
1997	**Texas A&M University**	B.S., Agricultural Development B.S., Horticulture

TESTIMONY

2010

Public Service Commission of Delaware Docket No. 09-414/09-276T: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

2009

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.

Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Corporation Commission of the State of Oklahoma Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

2008

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately $161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

2007
Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

2006
Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

2005
Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

2004
Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS
Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

Chriss, S. and M. Radler (2003). "Report from Houston: Conference on Energy Deregulation and Restructuring." USAEE Dialogue, Vol. 11, No. 1, March, 2003.

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

Walmart

Print

State By State Information

Missouri Community Impact

Real Estate

As of January 2010, Walmart's presence in Missouri includes:

	Missouri
Supercenters:	99
Discount Stores:	20
Neighborhood Markets:	0
Sam's Clubs:	16
Distribution Centers:	3

Average store size (national average)

Supercenter: 186,000 sq. ft. with approx. 142,000 items
Discount Store: 108,000 sq. ft. with approx. 120,000 items
Neighborhood Market: 42,000 sq. ft. with approx. 29,000 items
Sam's Club: 133,000 sq. ft. with approx. 5,500 items

People

- As of January 2010, the total number of Walmart associates in Missouri is 42,625.
- As of January 2010, the average wage for regular, full-time hourly associates in Missouri is $11.63 per hour (Walmart Discount Stores, Supercenters, and Neighborhood Markets). Additionally, associates are eligible for performance-based bonuses.
- In recent years, Walmart has contributed four percent of an associate's eligible pay to their combined Profit Sharing and 401(k) Plan.

Suppliers

- In FYE 2009, Walmart spent $7,129,528,251.00 for merchandise and services with 1,852 suppliers in the state of Missouri. As a result of Walmart's relationship with these suppliers, Walmart supports 99,810 supplier jobs in the state of Missouri.
- Supplier figures provided by Dun & Bradstreet.

Taxes and Fees

- Walmart collected on behalf of the state of Missouri more than $510.4 million in sales taxes in FYE 2009.
- Walmart paid more than $51.5 million in state and local taxes in the state of Missouri in FYE 2009.

Community Involvement

- In 2008, Walmart stores, Sam's Club locations and the Walmart Foundation gave more than $9.7 million in cash and in-kind donations to local organizations in the communities they serve in the state of Missouri. Through additional funds donated by customers, and Walmart and Sam's Club associates throughout the state, the retailer's contributions in Missouri totaled more than $12.2 million.

	Party		Current LGS/SP Rate Payments Above Cost of Service
(1)	MIEC	$	84,603,000
(2)	Staff (4CP)	$	73,663,785
(3)	Staff (Capacity Utilization)	$	72,306,820
(4)	AmerenUE	$	64,791,000
(5)	OPC (Avg. & 4CP Production)	$	28,001,742
(6)	OPC (TOU Production)	$	22,896,370

Sources:
(1) Revised Schedule MEB-COS-5
(2) Schdule MSS-1
(3) Schedule MSS-2
(4) Schedule WMW-E1
(5) and (6) Kind Direct Attachment A