Diana M. Vuylsteke Voice (314) 259-2543 dmvuylsteke@bryancave.com

#### **BY HAND DELIVERY**

BRYANEAVI

January 31, 2007

Cully Dale Secretary/Chief Administrative Law Judge Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65101 FILED<sup>2</sup> JAN 3 1 2007

JAN DI ZUUI

#### Missouri Public Service Commission

RE: Case No. ER-2007-0002

Dear Judge Dale:

Attached for filing on behalf of the Missouri Industrial Energy Consumers are an original and eight (8) copies of the Rebuttal Testimony of James T. Selecky in the above-referenced case.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Cheana Vingleteke

Diana M. Vuylsteke DMV:ln

Attachments cc: All Parties

#### Bryan Cave LLP One Metropolitan Square

- 211 North Broadway Suite 3600 St. Louis, MO 63102-2750 Tel (314) 259-2000 Fax (314) 259-2020 www.bryancave.com
- Chicago Hong Kong Irvine Jefferson City Kansas City Kuwait Los Angeles New York Phoenix Shanghai St. Louis Washington, DC

And Bryan Cave, A Multinational Partnership, London

Exhibit No.: Witness: Type of Exhibit: Issue: Sponsoring Party: Case No.:

)

James T. Selecky Rebuttal Testimony Depreciation Missouri Industrial Energy Consumers ER-2007-0002

#### Before the Public Service Commission of the State of Missouri

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Case No. ER-2007-0002

Rebuttal Testimony of

James T. Selecky on Book Depreciation

On behalf of

**Missouri Industrial Energy Consumers** 



BRUBAKER & ASSOCIATES, INC. St. Louis, MO 63141-2000

> Project 8632 January 31, 2007

#### Before the Public Service Commission of the State of Missouri

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Case No. ER-2007-0002

STATE OF MISSOURI

COUNTY OF ST. LOUIS

#### Affidavit of James T. Selecky

James T. Selecky, being first duly sworn, on his oath states:

SS

1. My name is James T. Selecky. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 1215 Fern Ridge Parkway, Suite 208, St. Louis, Missouri 63141-2000. 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 rebuttal testimony which was prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. ER-2007-0002.

3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things it purports to show.

James T. Selecky

Subscribed and sworn to before this 31<sup>st</sup> day of January 2007.

CAROL SCHULZ Notary Public - Notary Sez STATE OF MISSOURJ St. Louis County My Commission Expires: Feb. 26, 2008

Schul

Notary Public

My Commission Expires February 26, 2008.

#### Before the Public Service Commission of the State of Missouri

)

)

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area.

Case No. ER-2007-0002

#### Rebuttal Testimony of James T. Selecky

- 1 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A James T. Selecky. My business address is 1215 Fern Ridge Parkway, Suite 208,
- 3 St. Louis, Missouri 63141-2000.
- 4 Q ARE YOU THE SAME JAMES T. SELECKY WHO HAS PREVIOUSLY FILED 5 TESTIMONY IN THIS PROCEEDING?
- A Yes. I have previously filed Direct Testimony on book depreciation rates and
  7 expense.
- 8 Q ARE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE OUTLINED IN

#### 9 THAT PRIOR TESTIMONY?

.

- 10 A Yes. This information is included in Appendix A to my Direct Testimony.
- 11 Q WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
- A The purpose of my rebuttal testimony is to address the Direct Testimony of Jolie L.
   Mathis filed on behalf of the Missouri Public Service Commission Utility Service
   Division (Staff). Specifically, I will address the Staff's proposed depreciation rates for

the Callaway Nuclear Power Plant (Callaway) and the proposed net salvage percentages for the Transmission, Distribution and General (TDG) plant accounts. These net salvage percentages are used to develop the Staff's proposed TDG depreciation rates. The fact that an issue is not addressed should not be construed as an endorsement of a Staff position. Finally, I will submit revisions to a few schedules that were filed with my Direct Testimony.

7 Callaway Depreciation Rates

## 8 Q DO YOU HAVE ANY COMMENTS TO MAKE REGARDING THE STAFF'S 9 PROPOSED DEPRECIATION RATES FOR CALLAWAY?

10 А Yes. The Staff's proposed depreciation rates for Callaway are excessive. The Staff 11 is doubling the remaining life span for Callaway, but the change in the depreciation 12 rate only reduces the depreciation expense by approximately 7%. All other things 13 being equal, doubling the life span should reduce the depreciation expense by 50%. 14 As a result, the Staff's proposed remaining lives for the Callaway accounts are 15 understated. In addition, the Staff's proposed net salvage ratio of negative 37% for 16 Account 322 Reactor Plant Equipment is excessive. These factors produce 17 depreciation rates for Callaway that are too high

18 Q HAVE YOU ESTIMATED THE AVERAGE SERVICE LIVES THAT THE STAFF 19 UTILIZED TO DEVELOP ITS BOOK DEPRECIATION RATES?

- 20 A Yes. Using the information contained on Ms. Mathis's Schedule JLM-2, the nuclear 21 plant account balances, and corresponding accumulated depreciation balances as of 22 December 31, 2005, I have estimated the remaining lives that correspond to the
- 23 depreciation rates that the Staff has developed for Callaway. Table 1 below shows

- 1 the remaining lives that would be needed to calculate the Staff's depreciation rates as
- 2 shown on Schedule JLM-2.

#### TABLE 1

#### Staff's Estimated Callaway Remaining Lives for Depreciation Purposes

Plant Account	Remaining Life
321	27.6
322	31.0
323	29.4
324	27.2
325	25.9

- 3 It should be noted that those remaining lives reflect a probable retirement date for
- 4 Callaway of October 2044.

#### 5 Q HOW DO THE STAFF'S CALCULATED REMAINING LIVES COMPARE WITH THE

#### 6 REMAINING LIVES THAT THE COMPANY PROPOSED?

7 A Table 2 below shows AmerenUE's proposed remaining lives for Callaway.

TABLE	2
-------	---

#### AmerenUE's Estimated Callaway Remaining Lives for Depreciation Purposes

Plant Account	Remaining Life
321	18.2
322	17.4
323	18.3
324	18.3
325	17.2

1 The remaining lives proposed by AmerenUE reflect a probable retirement date of 2 October 2024. This is 20 years earlier than the retirement date proposed by the Staff.

#### 3 Q WHAT DOES THE INFORMATION CONTAINED IN TABLES 1 AND 2 INDICATE?

A The information contained in Tables 1 and 2 shows that although the Staff lengthened the life span of the unit by 20 years, it only increased the remaining life by approximately 10 years. The remaining lives should have increased by more than 10 years if the life span is lengthened by 20 years. Table 3 compares the differences in the remaining lives between that proposed by AmerenUE for Callaway and the remaining lives that support the Staff's proposed Callaway depreciation rates.

TABLE 3											
Comparison of Staff's and AmerenUE's Callaway Remaining Lives											
Plant Account	Staff's <u>Remaining Life</u>	AmerenUE's <u>Remaining Life</u>	Difference								
321	27.6	18.2	9.4								
322	31.0	17.4	13.6								
323	29.4	18.3	11.1								
324	27.2	18.3	8. <del>9</del>								
325	25.9	17.2	8.7								
Average	28.2	17. <del>9</del>	10.3								

10 The Staff's remaining lives are inappropriate and do not reflect the full effects of life 11 extension. Therefore, the Commission should reject the Staff's proposed Callaway 12 depreciation rates because the remaining lives are understated.

> James T. Selecky Page 4

## 1 Q DO YOU HAVE ANY OBJECTIONS TO THE NET SALVAGE RATIOS THAT WERE 2 UTILIZED TO DETERMINE THE STAFF'S DEPRECIATION RATES FOR THE 3 REACTOR PLANT EQUIPMENT?

4 A Yes. I believe the Commission should adopt AmerenUE's position that a 0% net
5 salvage is appropriate for the Callaway plant accounts. However, if the Commission
6 does desire to reflect some net salvage for interim retirements, the net salvage
7 percentage for Account 322 Reactor Plant Equipment of negative 37% as proposed
8 by the Staff should be rejected and replaced with negative 3%.

#### 9

10

Q

# INAPPROPRIATE FOR ACCOUNT 322 REACTOR PLANT EQUIPMENT?

WHY DO YOU BELIEVE THAT A NET SALVAGE RATIO OF NEGATIVE 37% IS

11 It should be remembered that the Company is accruing a decommissioning provision А 12 that will provide funds to remove Callaway at the end of its useful life. Therefore, a 13 provision for final retirement should not be included in the depreciation rates. The 14 negative 37% proposed by the Staff for Account 322 is excessive and should only 15 reflect the net salvage of the ongoing interim retirement activity. Applying a negative 16 37% to the entire Account 322 plant balance will overstate the funds needed for net 17 salvage for interim retirements. The Company also must concur with that position in 18 that they did not propose a negative net salvage for this plant account.

The negative 37% net salvage ratio provides AmerenUE with an annual provision for net salvage of approximately \$9.1 million. Over the last 10 years, the average annual actual net salvage expense for this account is \$3.3 million. However, the actual experience is significantly influenced by 2005 retirement activity. Removing the 2005 retirement activity reduces the actual annual net salvage expense to approximately \$600,000 per year.

# 1QWHAT IS YOUR RECOMMENDATION REGARDING THE NUCLEAR2DEPRECIATION RATES?

A My recommendation is that the Commission adopt the nuclear depreciation rates that
 I proposed in my Direct Testimony. These depreciation rates are shown on Schedule
 JTS-7 to my Direct Testimony.

#### 6 **TDG Net Salvage Ratios**

## 7 Q PLEASE COMMENT ON THE NET SALVAGE RATIOS PROPOSED BY THE 8 STAFF TO DEVELOP THEIR TDG DEPRECIATION RATES.

9 Α The net salvage ratios proposed by the Staff to develop their TDG depreciation rates 10 are excessive and should be rejected. These net salvage ratios are shown on 11 Schedule JLM-2 to the testimony of Staff witness Jolie L. Mathis. These net salvage 12 percentages produce a net salvage provision for depreciation of approximately 13 \$50.7 million on an annual basis. As indicated in my Direct Testimony, AmerenUE's 14 average annual net salvage expense has been approximately \$4.95 million over the 15 last five years, and \$5.871 million over the last ten years. Since the Staff's proposed 16 net salvage ratios are developed from the most recent five years of experience, a 17 comparison of AmerenUE's actual net salvage expense to the level of net salvage 18 expense that the Staff is proposing to include in its rates indicates that on an annual 19 basis, AmerenUE would have included in its depreciation rates a component for net 20 salvage that is 10 times greater than its actual experience.

#### 1 Q HOW DID MS. MATHIS DEVELOP THE NET SALVAGE COMPONENT FOR HER

#### 2 TDG DEPRECIATION RATES?

3 A Ms. Mathis states in her testimony on page 8 the following:

4 "For each account, I took the actual net salvage for the past 5 years
5 and divided it by the original cost of plant retired during the same 5
6 years. For a few accounts, an unusually high or low net salvage
7 amount was excluded to eliminate the percentage amount that may
8 cause the average to be skewed." (Direct Testimony of Jolie Mathis,
9 Page 7, Lines 11-14)

#### 10 Q PLEASE COMMENT ON THE METHOD THAT MS. MATHIS USED TO DEVELOP

#### 11 THESE NET SALVAGE RATIOS.

12 А My primary concern is that the sample size that Ms. Mathis used to develop her net 13 salvage ratios is small and may not provide an accurate representation of what it will 14 cost to retire assets in the future. My Schedule JTS-15 shows the relationship 15 between the retirements and the current plant balances for all of the TDG accounts. 16 As Schedule JTS-15 shows, for certain accounts the Staff utilized the results of the 17 five-year net salvage history even though the retirement experience was only 18 approximately 1% of the current plant balances. That is, the Staff's recommended net 19 salvage percentages are based on a sample size of 1% of the current plant balances. 20 In other instances, the Staff rejected the net salvage ratio that is supported by the 21 five-year data in situations where the net salvage experience was also 22 approximately 1%.

For example, for Account 353 Station Equipment, the five-year net salvage history indicates that a net salvage ratio of 48% is appropriate. For that account, the retirements that have occurred over the last five years are approximately 1.63% of the current plant balance. In this instance, the 48% was rejected by the Staff. However, 1 for Accourt 369.1 Overhead Services the Staff accepted the -303% net salvage ratio 2 even though the historical data indicates that the retirements have only been 3 approximately 1.32% of the current plant balance. Finally, for Account 354 Towers 4 and Fixtures and Account 369.2 Underground Services the Staff utilized the 5 retirement history over the last five years to support its net salvage ratio even though 6 the percent retirements as they relate to the current plant balance are less than 1%. 7 Because of the limited retirement experience, the Staff's proposed TDG net salvage 8 percentages should not be used to develop depreciation rates.

## 9 Q DO YOU HAVE ANY ADDITIONAL COMMENTS REGARDING THE 10 DEVELOPMENT OF THE STAFF'S PROPOSED NET SALVAGE RATIOS?

11 А Yes. As I indicated in my Direct Testimony on Page 35, during the past 40 years, 12 annual inflation as measured by the CPI and GNP price deflator, has been 13 approximately 4% However, current projections of inflation through 2030 are 14 approximately 2.5%. Ms. Mathis at a minimum should have adjusted the net salvage 15 ratios to reflect a lower level of inflation. Lower inflation should reduce net salvage 16 costs thereby reducing the net salvage ratios that are developed by dividing net 17 salvage by retirement. It should be remembered that the plant that will be retired was 18 placed in service over the last 40 years when inflation was higher. Because I address 19 this in my Direct Testimony, I will not repeat all of the arguments again. As I stated in 20 my Direct Testimony, reflecting current projections of future inflation rather than 21 historic projections in the net salvage ratio would reduce the proposed net salvage 22 ratios by approximately 55%.

1QIF THE COMMISSION DECIDES TO REFLECT NET SALVAGE IN AMERENUE'S2PROPOSED TDG PROPOSED DEPRECIATION RATES, BASED ON A RATIO OF3NET SALVAGE EXPENSE TO RETIREMENTS AS OPPOSED TO ACTUAL NET4SALVAGE EXPENSE, WHAT IS YOUR RECOMMENDATION?

5 A For the reasons outlined above, I would reject the Staff's proposed net salvage ratios 6 for the TDG accounts because they rely on insufficient history. In place of the Staff's 7 net salvage ratios, I recommend the Commission utilize AmerenUE's proposed net 8 salvage ratio for its TDG accounts. However, those should be reduced by 55% to 9 reflect current projections of future inflation. The Commission should not utilize the 10 Staff's proposed net salvage ratios for the TDG accounts to develop the TDG 11 depreciation rates.

If the Commission wants to develop depreciation rates utilizing the ratio of historic net salvage cost to retirements, it should adjust the ratios to reflect current projections for inflation. Therefore, I recommend the Commission utilize AmerenUE's proposed net salvage ratios reduced by 55%. I have provided these net salvage ratios in my Schedule JTS-16.

#### 17 <u>Revisions to Direct Testimony</u>

#### 18 Q DO YOU HAVE ANY CHANGES TO MAKE TO YOUR DIRECT TESTIMONY?

A Yes. In preparing my response to a Data Request from AmerenUE, it became
 evident that certain steam production depreciation rates were understated because of
 the application of my proposed net salvage ratio of -0.5% for the non-nuclear
 production plant accounts. I have corrected the calculation of the depreciation rates.
 In addition, I have attached to my Rebuttal Testimony Revised Schedules JTS-5,
 JTS-6, JTS-13, and JTS-14. The net effect of this change increases my proposed

James T. Selecky Page 9 depreciation expense from \$253.500 million to \$254.279 million, or an increase of
 \$779,000.

#### 3 Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

4 A Yes, it does.

i

÷.

\\Huey\Shares\PLDocs\MCL\8632\Testimony - BAI\106307.DOC

#### MIEC Proposed Non-Nuclear Production Depreciation Rates

T

1

I

ł

				Plant		Accured	Remaining	Net		Proposi	ad
	Acct.			Balance		Depreciation	Life	Salvage		Depreciation	Depreciation
Line	No.	Account		12/31/2005		12/31/2005	(Y <u>rs)</u>	(%)		Expense	Rate (1)
				(1)		(2)	(3)	(4)		(5)	(6)
		Steam Production Plant:									
		Meramec Steam Production Plant									
1	311	Structures & Improvements	\$	36,285,697	\$	20,347,255	20.0	-0.5%	3	805,994	2.22%
2	312	Boiler Plant Equipment		403,333,321		135,450,335	18.8	-0.5%		14,355,364	3.56%
3	314	Turborgenerator Units		81,963,286		35,962,414	19.3	-0.5%		2,404,699	2.93%
4	315	Accessory Electrical Equipment		36,268,698		15,905,980	19.7	-0.5%		1,042,846	2.68%
5	316	Miscellaneous Power Plant Equipment		13,521,142		4.640,981	18.6	-0.5%		481,063	3.56%
6		Total Meramec Steam Production Plant	<u> </u>	571,372,144	\$	212,306,965			\$	19,090,965	
		Sioux Steam Production Plant									
7	311	Structures & Improvements	\$	25,194,894	¢	13,855,897	19.9	-0.5%	\$	576,129	2.29%
8	312	Boiler Plant Equipment	Ψ	325,939,982	4	132,238,423	18.6	-0.5%	9	10,501,681	3.22%
9	314	Turborgenerator Units		89,835,326		30,210,407	19.2	-0.5%		3,128,859	3.48%
10	315	Accessory Electrical Equipment		34,600,610		11,890,004	19.7	-0.5%		1,161,605	3.36%
11	316	Miscellaneous Power Plant Equipment		7,713,733		3,056,936	18.5	-0.5%		253,804	3.29%
12	010	Total Sioux Steam Production Plant		483,284,545	5	191,251,567	10.0	-0.070	\$	15,622,077	. 0.2010
		Total cloax cican r rougenest rain		400,204,040	÷	101,201,001			Ť.		•
		Labadie Steam Production Plant									
13	311	Structures & Improvements	\$	61,791,585	\$	34,228,484	19.9	-0.5%	\$	1,400,606	2.27%
14	312	Boiler Plant Equipment		556,070,480		281,700,952	1B.4	-0,5%		15,062,493	2.71%
15	312.03	Boiler Plant Equipment - Aluminum Coal Cars		121,206,826		35,958,486	12.7	-0.5%		6,760,187	5.58%
16	314	Turborgenerator Units		183,529,904		73,901,093	19.1	-0.5%		5,787,773	3.15%
17	315	Accessory Electrical Equipment		72,780,646		37,042,355	19,6	-0.5%		1,841,949	2.53%
18	316	Miscellaneous Power Plant Equipment		16,724,383		6,756,697	18.5	-0.5%		543,314	3.25%
19		Total Labadie Steam Production Plant	\$	1,012,103,823	\$	469,588,067			\$	31,396,322	
		Rush Island Steam Production Plant									
20	311	Structures & Improvements	5	52,312,785	*	29,545,640	25,1	-0.5%	s	917,478	1.75%
21	312	Boiler Plant Equipment	\$	353,903,249	Þ		23.7	-0.5%	э		
22	314	Turborgenerator Units				171,795,897 56,053,858	23.3 24.0	-0.5%		7,891,711 3,361,149	2.23% 2.47%
23	315	Accessory Electrical Equipment		136,041,231 32,922,076		15,450,157	24.0	-0.5%		708,294	2.15%
23	315	Miscellaneous Power Plant Equipment		10,112,325		3,736,856	24.5	-0.5%		273,448	2.70%
25	310	Total Rush Island Steam Production Plant	5	585,291,666		276,582,408	23.5	-0.5%	5	13,152,081	2.10%
23		Total Rush Island Steam Production Plant	<u> </u>	365,231,000	4	210,002,400				13,132,001	:
		Common									
26	311	Structures & Improvements	\$	1,959,206	\$	369,071	20.2	-0.5%	\$	79,204	4.04%
27	312	Boiler Plant Equipment		37,071,156		6,964,094	19.2	-0.5%		1,577,730	4.26%
28	315	Accessory Electrical Equipment		3,129,975		573,594	19.8	-0.5%		129,901	4 15%
29	316	Miscellaneous Power Plant Equipment		20,843		3,394	18.7	-0.5%		939	4.50%
30		Total Common	\$	42,181,179	\$	7,910,153			\$	1,787,774	
31		Total Steam Production Plant	<u>s</u>	2,694,233,356	\$	1,157,639,260			5	81,049,219	

- -

#### MIEC Proposed Non-Nuclear Production Depreciation Rates

				Plant		Accured	Remaining	Net		Proposed				
	Acct.			Balance		Depreciation	Life	Salvage		Depreciation	Depreciation			
Line	No.	Account		<u>12/31/2005</u>		12/31/2005	<u>(Yrs)</u>	(%)		Expense	Rate (1)			
				(1)		(2)	(3)	(4)		(5)	(6)			
		Hydraulic Production Plant:												
		Osage Hydraulic Production Plant												
32	331	Structures & Improvements	\$	3,750,644	\$	2,073,800	29.3	-0.5%	5	57,870	1.54%			
33	332	Reserviors, Dams, & Waterways		25,597,635		17,269,889	30.1	-0.5%		280,921	1.10%			
34	333	Water Wheels, Turbines, & Generators		19,301,223		7,448,926	29.3	-0.5%		407,809	2.11%			
35	334	Accessory Electrical Equipment		4,112,456		1,437,896	25.7	~0.5%		104,869	2.55%			
36	335	Miscellaneous Power Plant Equipment		1,699,727		384,782	26.1	-0.5%		50,707	2.98%			
37	336	Roads, Railroads, & Bridges*		77,445		47,805	1.0	-0.5%		30,027	38.77%			
38		Total Osage Hydrautic Production Plant	5	54,539,128	\$	28,663,098			5	932,203				
		Keokuk Hydraulic Production Plant												
39	331	Structures & Improvements	S	3,791,127	\$	1,811,913	29.5	-0.5%	\$	67,735	1.79%			
40	332	Reserviors, Dams, & Waterways	-	12,170,523	•	7,238,534	30.1	-0.5%	•	165.875	1.36%			
41	333	Water Wheels, Turbines, & Generators		58,830,125		11,553,069	29.6	-0.5%		1,607,135	2.73%			
42	334	Accessory Electrical Equipment		9,161,004		1,937,515	26.2	-0.5%		277,454	3.03%			
43	335	Miscellaneous Power Plant Equipment		2,630,627		585,968	26.2	-0.5%		78.542	2.99%			
44	336	Roads, Railroads, & Bridges		114,925		45,598	30.5	-0.5%		2.292	1.99%			
45	-	Total Keokuk Hydraulic Production Plant	\$	86,698,332	\$	23,172,597			\$	2,199,033				
		Taxas Revel Made at a Revelue to a Direct		<u>-</u>	_									
46	331	Taum Sauk Hydraulic Production Plant Structures & Improvements	\$	E 400 000		0 400 747			~					
40	332		э	5,468,208	Э	3,100,747	29.6	-0.5%	\$	B0,905	1.48%			
47		Reserviors, Dams, & Waterways		27,594,082		15,519,625	30.3	-0.5%		403.050	1.46%			
40	333	Water Wheels, Turbines, & Generators		37,277,699		13,332,408	29.3	-0.5%		823,607	2.21%			
49	334	Accessory Electrical Equipment		4,106,261		1,326,931	26.1	-0.5%		107,274	2.61%			
50	335	Miscellaneous Power Plant Equipment		1,620,780		297,631	26.4	-0.5%		50,426	3.11%			
52	336	Roads, Railroads, & Bridges*		45,570		24,729	1.0	-0.5%		21,069	46.23%			
52		Total Taum Sauk Hydraulic Production Plant	\$	76,112,599	5	33,602,071			\$	1,486,332				
53		Total Hydraulic Production Plant	\$	217,350,059	\$	85,437,766			\$	4,617,568				
		Other Production Plant:												
54	341	Structures & Improvements	\$	15,310,060	\$	3,498,977	31.2	0.0%	5	378,560	2.47%			
55	342	Fuel Holders, Producers, & Accessories		12,123,101		2,826,700	28.9	0.0%	•	321,675	2.65%			
56	344	Generators		583,555,235		87,823,660	31.8	0.0%		15,589,043	2.67%			
57	345	Accessory Electrical Equipment		26,830,796		7,015,500	29.3	0.0%		676,290	2.52%			
58	346	Miscellaneous Power Plant Equipment		5,376,474		804,756	32.7	0.0%		139,808	2.60%			
59		Total Other Production Plant	\$	643,195,666	5	101,969,593			<u>.</u> \$	17,105,376				
60		Total Production Plant	5	3,554,779,080	\$	1,345,046,619			\$	102,772,164				

Note: (1). Depreciation rates do not reflect the impact of reserve variance.

-----

#### Comparison of UE and MIEC Proposed Non-Nuclear Production Depreciation Rates and Expense Based on 6/30/2006 Plant Balance

ī

ł

ł

	Acct.		P	AmerenUE Propo Depreciation Rates	osed		MIEC Propose Depreciation Rates		_	
<u>Line</u>	<u>No.</u>	Account		Amount (1)	Rate <sup>(1)</sup> (2)		Amount (3)	<u>Rate</u> (4)	- !	<u>Difference</u> (5)
		Steam Production Plant: Meramec Steam Production Plant								
1	311	Structures & Improvements	\$	915,072	2.48%	\$	819,596	2.22%	\$	(95,476)
2	312	Boiler Plant Equipment	•	19,602,312	4 91%		14,210,396	3.56%		(5,391,916)
3	314	Turborgenerator Units		2,592,839	3.16%		2,407,298	2.93%		(185,541)
4	315	Accessory Electrical Equipment		1,146,562	3 16%		1,043,274	2.88%		(103,287)
5	316	Miscellaneous Power Plant Equipment		649,774	4.74%		487,722	3.56%		(162,052)
6		Total Meramec Steam Production Plant	\$	24,906,559		\$	18,968,286		\$	(5,938,273)
_		Sioux Steam Production Plant	•	007 465	2.070	<i>~</i>	670 404	0.000/	•	(040 704)
7	311	Structures & Improvements	\$	827,155	3.27%	\$	578,424	2.29% 3.22%	\$	(248,731) (5,152,824)
8	312	Boiler Plant Equipment		15,740,763	4.79% 4.65%		10,587,939 3,184,767	3.22% 3.48%		(1,067,218)
9	314	Turborgenerator Units		4,251,986 1,524,269	4.40%		1,163,010	3.36%		(361,259)
10	315	Accessory Electrical Equipment Miscellaneous Power Plant Equipment		389,357	4.40%		261,982	3.29%		(127,374)
11	316	Total Sioux Steam Production Plant	\$	22,733,529	4.09%	\$	15,776,123	0.23 /0	\$	(6,957,406)
12		Total Sloux Steam Production Plant	<u> </u>			<u>_</u>	10,170,120			(0,007,4007
		Labadie Steam Production Plant							_	
13	311	Structures & Improvements	\$	1,984,805	3.21%	\$	1,401,521	2.27%	\$	(583,285)
14	312	Boiler Plant Equipment		19,833,614	3.54%		15,176,290	2,71%		(4,657,324)
15	312.03	Boiler Plant Equipment - Aluminum Coal Cars		3,598,599	3.05%		6,580,595	5.58%		2,981,997
16	314	Turborgenerator Units		8,026,623	4,31%		5,873,003	3.15%		(2,153,620)
17	315	Accessory Electrical Equipment		2,473,069	3.38%		1,851,745	2.53%		(621,324)
18	316	Miscellaneous Power Plant Equipment		698,331	4.05%		560,153	3.25%		(138,178)
19		Total Labadie Steam Production Plant	\$	36,615,041			31,443,308		\$	(5,171,733)
		Rush Island Steam Production Plant								(707 000)
20	311	Structures & Improvements	\$	1,514,299	2.89%	\$	918,971	1.75%	\$	(595,328)
21	312	Boiler Plant Equipment		12,027,340	3.39%		7,911,458	2.23%		(4,115,882)
22	314	Turborgenerator Units		5,616,420	4.13%		3,359,903	2.47%		(2,256,517)
23	315	Accessory Electrical Equipment		1,139,234	3.46%		708,375 273,717	2.15% 2.70%		(430,859) (140,284)
24	316	Miscellaneous Power Plant Equipment	*	414,001 20,711,293	4.09%		13,172,424	2.70%	\$	(7,538,869)
25		Total Rush Island Steam Production Plant	\$	20,711,293	•	\$	13,172,424		<u></u>	(1,556,889)
	<b>.</b>	Common	•	04.400	1.050			4.049/	¢	(11 800)
26	311	Structures & Improvements	\$	91,103	4.65%	\$	79,205	4.04%	\$	(11,899) (218,514)
27	312	Boiler Plant Equipment		1,794,244	4.84%		1,577,730	4.26% 4.15%		(216,514)
28	315	Accessory Electrical Equipment		148,674	4.75%		129,901	4.15% 4.50%		(18,773)
29	316	Miscellaneous Power Plant Equipment	-	1,040	4.99%		939	4.00%	\$	(101)
30		Total Common	\$	2,035,061	•	\$	1,787,774		<u> </u>	(247,287)
31		Total Steam Production Plant	\$	107,001,483	<b>a</b>	\$	81,147,915		\$	(25,853,569)

#### Comparison of UE and MIEC Proposed Non-Nuclear Production Depreciation Rates and Expense Based on 6/30/2006 Plant Balance

	Acct.			AmerenUE Propo Depreciation Rates			MIEC Propose Depreciation Rates			
<u>Line</u>	<u>No.</u>	Account	,;	Amount (1)	Rate 11) (2)		Amount (3)	<u>Rate</u> (4)	•	Difference (5)
		Hydraulic Production Plant:								
		Osage Hydraulic Production Plant								
32	331	Structures & Improvements	\$	98,063	2.54%	\$	59,569	1.54%	\$	(38,494)
33	332	Reserviors, Dams, & Waterways		564,766	2.22%		279,190	1.10%		(265,576)
34	333	Water Wheels, Turbines, & Generators		486,391	2.52%		407,809	2.11%		(78,582)
35	334	Accessory Electrical Equipment		106,513	2.59%		104,869	2.55%		(1,644)
36	335	Miscellaneous Power Plant Equipment		53,397	3.01%		52,922	2,98%		(475)
37	336	Roads, Railroads, & Bridges*		-	0.00%			38.77%		30,027
38		Total Osage Hydraulic Production Plant	\$	1,309,129		\$	934,386		\$	(374,743)
		Keakuk Hydraulic Production Plant								
39	331	Structures & Improvements	\$	103,345	2.51%	\$	73,563	1.79%	\$	(29,782)
40	332	Reserviors, Dams, & Waterways		299,286	2.42%		168,556	1.36%		(130,730)
41	333	Water Wheels, Turbines, & Generators		2,006,704	3.39%		1,617,098	2.73%		(389,606)
42	334	Accessory Electrical Equipment		317,181	3.46%		277,638	3.03%		(39,543)
43	335	Miscellaneous Power Plant Equipment		75,526	2.87%		78,570	2.99%		3,045
44	336	Roads, Railroads, & Bridges		1,988	1.73%		2,292	1.99%		304
45		Totat Keokuk Hydraulic Production Plant	\$	2,804,030	•	\$	2,217,716		\$	(586,314)
		Taum Sauk Hydraulic Production Plant								
46	331	Structures & Improvements	\$	148,590	2,70%	\$	81,425	1.48%	\$	(67,165)
47	332	Reserviors, Dams, & Waterways	•	769.667	2,79%	-	402,941	1.46%	-	(366,725)
48	333	Water Wheels, Turbines, & Generators		1,143,124	3.06%		825,359	2.21%		(317,765)
49	334	Accessory Electrical Equipment		116,013	2.77%		109,415	2.61%		(6,598)
50	335	Miscellaneous Power Plant Equipment		42,560	2.61%		50,734	3.11%		8,173
51	336	Roads, Railroads, & Bridges*		-	0.00%		21,069	46,23%		21,069
52	000	Total Taum Sauk Hydraulic Production Plant	\$	2,219,954	0.0070	\$	1,490,942	,	\$	(729,011)
53		Total Hydraulic Production Plant	\$	6,333,112		\$	4,643,044		\$	(1,690,068)
		Other Production Plant:								
54	341	Structures & Improvements	\$	383,015	2.49%	\$	380,342	2.47%	\$	(2,673)
55	342	Fuel Holders, Producers, & Accessories		358,130	2.92%		325,433	2.65%		(32,697)
56	344	Generators		16,633,083	2.85%		15,590,692	2.67%		(1,042,391)
57	345	Accessory Electrical Equipment		752,887	2.81%		675,341	2.52%		(77,546)
58	346	Miscellaneous Power Plant Equipment		155,229	2.74%		147,318	2.60%		(7,911)
59		Total Other Production Plant	\$	18,282,345		<u>\$</u>	17,119,126		\$	(1,163,218)
60		Total Production Plant (Excluding Nuclear)	\$	131,616,941	•	\$	102,910,085		\$	(28,706,855)

Note:

ł

(1). AmerenUE rates reflect the impact of amortization of reserve variance.

#### Comparison of Present, AmerenUE Proposed and MIEC Proposed <u>Depreciation Rates and Expense</u>

|

ł

i

ł

			Pro Forma		Currer	nt		AmerenUE Pr	oposed	MIEC Pro	osed
	Acet.		Balance	_	Depreciation	Depreclation		Depreciation	Depreciation	Depreciation	Depreciation
<u>Line</u>	<u>No.</u>	Account	<u>6/30/2006</u> (1)		Expense (2)	<u>Rate</u> (3)		Expense (4)	Bate_1) (5)	Expense (6)	Rate (7)
		Steam Production Plant:									
		Meramec Steam Production Plant									
1 2	311	Structures & Improvements		.058 \$		2.89%	ş	915,072	2.48%	\$ 819,596	2.22%
2	312 314	Boller Plant Equipment	399,232		12,735,514	3.19%		19,602,312	4.91%	14,210,396	3.56%
3	315	Turborgenerator Units Accessory Electrical Equipment	82,051 36,283		2,297,453	2.80%		2,592,839 1,146,562	3.16% 3.16%	2,407,298 1,043,274	2.93% 2.88%
5	315	Miscellaneous Power Plant Equipment	13,708		444,150			649,774	4,74%	487.722	
6	9,9	Total Meramec Steam Production Plant	\$568,174				5	24,906,559		\$ 18,968,286	3.30%
•			4 000,114		11,010,020	-	<u></u>	24,000,000	1	· · · · · · · · · · · · · · · · · · ·	-
		Sioux Steam Production Plant									
7	311	Structures & Improvements		269 S		2.89%	\$	827,155	3.27%	\$ 578,424	2.29%
8	312	Boller Plant Equipment	328,617		10,482,888	3.19%		15,740,763	4.79%	10,587,939	3.22%
9	314	Turborgenerator Units	91,440		2,560,335	2.60%		4,251,985	4.65%	3,184,767	3.48 %
10	315	Accessory Electrical Equipment	34,642		959,597	2.77%		1,524,269	4.40%	1,163,010	3.36%
11	316	Miscellaneous Power Plant Equipment	7,962		257,979	3.24%		389,357	4.89%	261,982	3.29%
12		Total Sioux Steam Production Plant	\$ 487,957	.//8 S	14,991,832	-	5	22,733,529		\$ 15,776,123	
		Labadie Steem Production Plant									
13	311	Structures & Improvements	\$ 61,831	.946 S	1,786,943	2,89%	s	1,984,605	3.21%	\$ 1.401.521	2.27%
14	312	Boiler Plant Equipment	560,271		17,872,663	3.19%		19,833,614	3.54%	15,176,290	2.71%
15	312.03	Boiler Plant Equipment - Aluminum Coal Cars	117,986	838	5.368.401	4.55%		3,598,599	3.05%	6,580,595	5.58%
16	314	Turborgenerator Units	186,232		5,214,512	2.80%		8,026,623	4.31%	5,873,003	3.15%
17	315	Accessory Electrical Equipment	73,167		2.026,746	2.77%		2,473,069	3.38%	1,851,745	2.53%
18	316	Miscellaneous Power Plant Equipment	17.242		558,665			698,331	4.05%	560,153	
19		Total Labadie Steam Production Plant	\$ 1,016,733	,380 \$	32,827,930		5	36,615,041	•	\$ 31,443,308	z –
		Rush Island Steam Production Plant									
20	311	Structures & Improvements	\$ 52,397	876 5	1,514,299	2.89%	ŝ	1,514,299	2,69%	\$ 918,971	1.75%
21	312	Boller Plant Equipment	354,788		0.317.762	3.19%	•	12.027.340	3.39%	7,911,458	2.23%
22	314	Turborgenerator Units	135,990	789	3,607,742	2.80%		5,615,420	4.13%	3,359,903	2.47%
23	315	Accessory Electrical Equipment	32,925	827	912,045	2.77%		1,139,234	3.46%	708,375	Z 15%
24	316	Miscellaneous Power Plant Equipment	10,122		327,962	3.24%		414,001	4.09%	273,717	2.70%
25		Total Rush Island Steam Production Plant	\$ 588,225	556 \$	17,879,810	2	5	20,711,293	ı.	\$ 13,172,424	
		Common									
26	311	Structures & improvements	\$ 1,959	206 S	56,621	2,89%	\$	91,103	4.65%	\$ 79,205	4.04%
27	312	Boiler Plant Equipment	37.071		1,182,570	3.19%	•	1,794,244	4.84%	1,577,730	4.26%
28	315	Accessory Electrical Equipment	3,129	975	86,700	2.77%		148,674	4.75%	129,901	4.15%
29	316	Miscellaneous Power Plant Equipment		843	675	3.24%		1,040	4.99%	939	4.50%
30		Total Common	\$ 42,181	180 \$	1,326,567	•	5	2,035,061		<u>\$ 1,787,774</u>	
31		Total Steam Production Plant	\$ 2,701,272	. <u>171 s</u>	84,574,665	•	\$	107,001,483		\$ 81,147,915	-

#### Comparison of Present, AmerenUE Proposed and MIEC Proposed <u>Depreciation Rates and Expense</u>

				Pro Forma		Current AmerenUE Proposed			MIEC Proposed				
	Acct.			Balance		Depreciation	Depreciation		Depreciation	Depreciation	D	epreciation	Depreciation
Line	<u>No.</u>	Account		<u>6/30/2006</u> (1)		Expense (2)	<u>Rate</u> (3)		Expense (4)	Rate <sup>(1)</sup> (5)		Expense (6)	Rate (7)
		Nuclear Production Plant:											
		Callaway Nuclear Production Plant									-		
32	321	Structures & Improvements	\$	893,268,025	\$	23,224,969	2 60%	s	24,922,178	2.79%	s	12,256,939	1.37% 1.66%
33	322	Reactor Plant Equipment		957,550,064		24,896,302	2 60%		38,493,513 16,959,770	4.02% 3.43%		15,871,047 7,649,694	1,55%
34	323	Turborgenerator Units		494,453,935		12,855,802	2.60%		5,606,082	2.66%		2,804,373	1.33%
35 36	324 325	Accessory Electrical Equipment		210,754,953		5.479.629 4.300.744	2 60% 2 60%		7,741,339	4.68%		2,978,345	1.80%
36	320	Miscellaneous Power Plant Equipment		165,413,219		4,300,744	2 60 /2		7,741,335	4.00 /8		2,010,040	1.00 /
37		Total Nuclear Production Plant	\$	2,721,440,196	\$	70,757,445		\$	93,722,881		\$	41,560,398	
		Hydraulic Production Plant:											
		Osage Hydraulic Production Plant											
38	331	Structures & Improvements	s	3,860,731	s	42,468	1 10%	\$	98,063	2.54%	S	59,569	1.54%
39	332	Reserviors, Dams, & Waterways		25,439,911		302,735	1 19%		564,765	2.22%		279,190	1.10%
40	333	Water Wheels, Turbines, & Generators		19,301,223		200,733	04%		485,391	2.52%		407,809	2.11%
41	334	Accessory Electrical Equipment		4,112,456		46,471	1 13%		106,513	2.59%		104,869	2,55%
42	335	Miscellaneous Power Plant Equipment		1,773,982		22,707	1 28%		53,397	3.01%		52,922	2.98%
43	336	Roads, Railroads, & Bridges	_	77,445	-	3,524	4 55 %		-	0.00%		30,027	38.77%
44		Total Osage Hydraulic Production Plant		54,565,748	-	618,637		<u>\$</u>	1,309,129		\$	934,386	
		Keokuk Hydraulic Production Plant									_		
45	331	Siructures & Improvements	\$	4,117,339	\$	45,291	1 10%	\$	103,345	2.51% 2.42%	\$	73,563	1.79% 1.36%
46	332 333	Reserviors, Dams, & Waterways		12,367,195		147,170	1 19%		299,285 2,005,704	3.39%		168,556 1,617,098	2.73%
47 48	333	Water Wheels, Turbines, & Generators Accessory Electrical Equipment		59,194,602 9,167,069		615,626 103,588	1 13%		2,005,704	3.46%		277,638	3.03%
40	335	Miscellaneous Power Plant Equipment		2,631,559		33,684	120%		75.526	2.87%		78,570	2,99%
50	336	Roads, Railroads, & Bridges		114,926		5,229	4.55%		1,988	1.73%		2,292	1.99%
51	200	Total Keokuk Hydraulic Production Plant	\$	87,592,890	\$	950,587		\$	2,804,030		\$	2,217,716	
		Taum Sauk Hydraulic Production Plant											
52	331	Structures & Improvements	s	5,503,349	\$	60,537	1 10%	s	148,590	2,70%	s	81,425	1,48%
53	332	Reserviors, Dams, & Waterways	•	27,586,615	•	328,281	1 19%	•	769.667	2.79%	•	402,941	1.46%
54	333	Water Wheels, Turbines, & Generators		37,356,990		388.513	1 04%		1,143,124	3.06%		825,359	2,21%
55	334	Accessory Electrical Equipment		4,188,184		47,326	1 13 %		115,013	2.77%		109,415	2.61%
56	335	Miscellaneous Power Plant Equipment		1,630,658		20,872	1 28%		42,560	2.61%		50,734	3.11%
57	336	Roads, Railroads, & Bridges		45,570		2,073	4.55%		-	0.00%		21,069	46.23%
58		Total Taum Sauk Hydraulic Production Plant	\$	76,311,366	\$	847,603		<u>_</u>	2,219,954		\$	1,490,942	•
59		Total Hydraulic Production Plant	5	218,470,004	5	2,416,827		\$	6,333,112		\$	4,643,044	
		Other Production Plant:											
60	341	Structures & Improvements	\$	15,362,120	s	615,285	4 00%	\$	383,015	2.49%	s	360,342	2.47%
61	342	Fuel Holders, Producers, & Accessories	-	12,264,732	-	490,589	4 00%	-	358,130	2.92%	-	325,433	2.65%
62	344	Generators		583,616,964		23,344,679	4 00%		16,633,083	2.85%		15,590,692	2.67%
63	345	Accessory Electrical Equipment		26,793,140		1,071,725	4 00%		752,887	2.61%		675,341	2.52%
64	345	Miscellaneous Power Plant Equipment		5,665,300		226,612	4 D()*v		155,229	2.74%		147.318	2.60%
65		Total Other Production Plant	<u>, \$</u>	643,722,256	5	25,748,890		5	18,282,345	1	<u> </u>	17,119,126	
66		Total Production	\$	6,284,904,627	\$	183,497,827		\$	225,339,821		\$	144,470,484	

i

i

## Comparison of Present, AmerenUE Proposed and MIEC Proposed Depreciation Rates and Expense

				Pro Forma	Current			AmeranUE Pro	oposed	MIEC Proposed			
	Acc1.			Balance		Depreciation	Depreciation		Depreciation	Depreciation	D	epreciation	Depreclation
<u>Line</u>	<u>No.</u>	Account		<u>6/30/2006</u> (1)		Expense (2)	Rate (3)		Expanse (4)	Rate <sup>(1)</sup> (5)		Expense (6)	Rate (7)
		Missouri Transmission Plant:											
67	352	Structures & Improvements	\$	6,219,706	\$	62,722	1.33%	5	111,333	1,79%	\$	104,491	1.68%
68	353	Station Equipment		181,457,965		3,629,159	2.00%		3,048,494	1.68%		3,302,535	1.82%
69	354	Towers & Fixtures		70,903,821		1,318,811	1,86%		1,028,105	1.45%		1,113,190	1.57%
70	355	Poles & Fixtures		113,204,654		3,158,410	2.79%		4,505,545	3.98%		2,479,182	2.19%
71	356	OH Conductor & Devices		116,782,727		1,722,350	1.45%		3,337,795	2.81%		2,244,994	1,89%
72	359	Road & Trails*		71,788		1,436	2.00%		(9,526)	-13.27 %		661	1.20%
73		Total Transmission Plant	5	490,640,661	\$	9,912,888		\$	12,021,746		\$	9,245,253	
		Missouri Distribution Plant:											
74	361	Structures & Improvements	\$	15,759,384	\$	233,239	1.48%	\$	275,769	1.75%	s	264,758	1.68%
75	362	Station Equipment		531,174,647		12,695,074	2.39%		9,667.379	1.82%		9,667,379	1.62%
76	364	Poles & Fixtures		557,886,888		43,945,508	5.68%		35,919,532	5.46%		18,354,486	2.79%
77	365	OH Conductors & Devices		725,041,472		23,128,823	3 19%		23,128,823	3.19%		16,675,954	2.30%
78	365	UG Conduit		172,578,086		2,985,601	1.73%		3,986,554	2.31%		2,864,796	1.66%
79	367	UG Conductor & Devices		459,391,695		7,947,476	1.73%		10,841,644	2.36%		9,004,077	1.96%
80	368	Line Transformers		353,005,604		7,342,521	2.08%		7,836,729	2.22%		7,836,729	2.22%
B1	369.1	OH Services*		126,844,185		10,464,645	8.25%		10,223,641	8.06%		4,439,546	3.50%
62	369.2	UG Services"		121,695,103		3,164,073	2,60%		4,843,465	3.98%		3,018,039	2.48%
83	370	Meters		103,953,474		2,858,721	2.75%		3,700,744	3.56%		3,711,139	3.57%
84	371	Installation on Customers' Premises*		164,858		3,627	2.20%		5,984	3.63%		5,166	3.74%
85	373	Street Lighting & Signal Systems		102,032,912		6,030,145	5.91%		4,479,245	4.39%		3,305,866	3.24%
86		Total Distribution Plant	\$	3,369,508,508	\$	120,799,452		\$	114,909,529		\$	79,148,935	,
		Missouri General Plant:											
87	390	Structures & Improvements	5	171,487,901	\$	3,927,073	2.29%	5	3,995,668	2.33%	\$	3,841,329	2.24%
66	391	Office Furniture & Equipment*		44,289,607		1,457,128	3,29%		2,094,898	4.73%		2,112,614	4.77%
69	391.1	Mainframe Computers		422,014		13,884	3.29%			0.00%		-	0.00%
90	391.2	Personal Computers*		1,796,928		59,119	3.29%		346,448	19,28%		348,963	19.42 % 8.92 %
91	392	Transportation Equipment*		83,429,052		6,674,324	8.00%		6.849.525	8.21%		7,441,871 78,090	3.71%
92	393	Stores Equipment*		2,104,841		57,883	2.75% 1.82%		77,037 471,832	3.66% 4.30%		476,222	4.34%
93	394	Tools, Shop & Garage Equipment*		10,972,846		199,706			471,032	4.30%		297,921	4,48%
94 95	395	Laboratory Equipment*		6,650,033 9,843,387		125,021 421,297	1.88% 4.28%		556,151	5.65%		641,789	6.52%
96	396	Power Operated Equipment		128,018,518		4,480,648	3,50%		5.978.465	4.67%		6,144,889	4.80%
90 97	397 398	Communications Equipment* Miscellaneous*		641.398		4,400,040 30,466	4.75%		30,915	4.82%		31,044	4.84%
98		Total General Plant	\$	459,656,525	\$	17,446,549	-	\$	20,696,202	- r	\$	21,414,732	•
99		Total TDG Electric Plant	\$	4,319,605,692	\$	148,158,889	-	\$	147,627,476		\$	109,808,920	
100		Total Electric Plant in Service	\$	10,604,710,319	\$	331,656,715	-	\$	372,967,298		\$	254,279,403	

\_\_\_

-----

I

1

Note: (1). AmerenUE rates reflect the impact of depreciation reserve variance.

. . . . . . . . .

Revised Schedule JTS-13 Page 3 of 3

---- ----

#### Comparison of AmerenUE Proposed and MIEC Proposed **Depreciation Expense**

<u>Line</u>	Description	Depreciation Depreciat		MIEC Proposed Depreciation Expense <sup>(1)</sup>	•	Difference	MO Jurisdictional <u>Percentage</u>	MO Jurisdictional <u>Expense</u>	
1	Steam Production	\$	107,001,483	\$	81,147,915	\$	(25,853,569)		
2	Hydraulic Production		6,333,112		4,643,044		(1,690,068)		
3	Other Production		18,282.345		17,119,126		(1,163,218)		
4	Total Non Nuclear Production	\$	131,616,941	\$	102,910,085	\$	(28,706,855)	98.33%	\$ (28,227,451)
5	Nuclear Production	\$	93,722,881	\$	41,560,398	\$	(52,162,482)	98.78%	\$ (51,526,100)
6	Total Production	\$	225,339,821	\$	144,470,484	\$	(80,869,338)		\$ (79,753,551)
7	Transmission	\$	12,021,746	\$	9,245,253	\$	(2,776,493)	100.00%	\$ (2,776,493)
8	Distribution		114,909,529		79,148,935		(35,760,594)	99.83%	(35,698,454)
Э	General	_	20,696,202		21,414,732		718,530	98.83%	710,123
10	Total TDG	\$	147,627,476	\$	109,808,920	\$	(37,818,557)		\$ (37,764,824)
11	Total	\$	372,967,298	\$	254,279,403	\$	(118,687,894)		\$ (117,518,374)

Note:

(1). Depreciation expense was calculated from 6/30/2006 plant balances
 (2). AmerenUE's proposed rates reflect impact of depreciation reserve variance.

#### AmerenUE - Electric

.

#### Analysis of Retirement and Net Salvage for TDG Accounts 2001 through 2005

<u>Line</u>	Acct. <u>No.</u>	<u>Account</u>	-	-Year Total etirements (1)	5-Year <u>Net Sai</u> (2)	vage	5-Year Total Net Salvage <u>Ratio</u> (3) ((2)/(1))		Pro Forma Balance <u>6/30/2006</u> (4)	Percent <u>Retirements</u> (5) ((1)/(4))	Staff Proposed <u>Net Salvage</u> (6)
		Transmission Plant:									
1	352	Structures & Improvements	\$	110,479	\$	-	0%	\$	6,219,706	1.78%	0%
2	353	Station Equipment		2,964,393	1,43	5,733	48%		181,457,965	1.63%	-6%
3	354	Towers & Fixtures		299,582	(6	5,647)	-22%		70,903,821	0.42%	-22%
4	355	Poles & Fixtures		2,130,884	1,71	3,087	80%		113,204,654	1.88%	-24%
5	356	OH Conductor & Devices		3,293,531	(6	6,475)	-2%		118,782,727	2.77%	-2%
6	359	Road & Trails*		-		-	0%		71,788	0.00%	0%
7		<b>Total Transmission Plant</b>	\$	8,798,869	\$ 3,01	6,698	34%	\$	490,640,661	1.79%	
		Distribution Plant:									
8	361	Structures & Improvements	\$	328,726	\$	-	0%	5	15,759,384	2.09%	0%
9	362	Station Equipment	Ψ	7.320,808		3,107)	-2%	Ψ	531,174,647	1.38%	-2%
10	364	Poles & Fixtures		9,324,685	(14,39		-154%		657,866,888	1.42%	-154%
11	365	OH Conductors & Devices		21,854,299		6,829)	-52%		725,041,472	3.01%	-52%
12	366	UG Conduit		622,357		3.607	1125%		172,578,086	0.36%	0%
13	367	UG Conductor & Devices		7,509,020		6,612)	-40%		459,391,695	1.63%	-40%
14	368	Line Transformers		13,918,299		0,747)	-1%		353,005,804	3.94%	-1%
15	369.1	OH Services*		1,673,633		9 195)	-303%		126,844,185	1.32%	-303%
16	369.2	UG Services*		1,073,861	• •	2,045)	-98%		121,695,103	0.88%	-98%
17	370	Meters		18,309,770		2,533	2%		103.953.474	17.61%	2%
18	371	Installation on Customers' Premises*			0,	-,	0%		164,856	0.00%	0%
19	373	Street Lighting & Signal Systems		3,109,724	(1.79	2,923)	-58%		102,032,912	3.05%	-58%
20		Total Distribution Plant	5	85,045,182	\$ (29,58		-35%	\$ 3	3,369,508,506	2.52%	
		General Plant:									
21	390	Structures & Improvements	\$	3.916.104	\$ (43	6,965)	-11%	\$	171,487,901	2.28%	-11%
22	390	Office Furniture & Equipment*	Ф	423,700		1,195	-11%	æ	44,289,607	2.28% 0.96%	-11%
22	391.1	Mainframe Computers		423,700 811,543		3,146	0%		44,209,007	192.30%	0%
23	391.1	Personal Computers*		13,057,787		4,701	0%		1,796,928	726.67%	0%
25	392	Transportation Equipment*		25,893,972		5,156	7%		83,429,052	31.04%	7%
25	393	Stores Equipment*		324,140		1,490	4%		2,104,841	15,40%	4%
27	394	Tools, Shop & Garage Equipment*		235,300		9,570	4%		10,972,846	2.14%	4%
28	395	Laboratory Equipment*		411,601		3,370	0%		6,650,033	6.19%	0%
29	396	Power Operated Equipment		3,025,272	38	0.107	13%		9,843,387	30.73%	13%
30	397	Communications Equipment*		10,748,287		-	0%		128,018,518	8.40%	0%
31	398	Miscellaneous*		64,748		1,200	2%		641,398	10.09%	2%
32		Total General Plant	\$	58,912,454		9,600	3%	\$	459,656,525	12.82%	
32		rotar general riditt	₽	30,712,404	<b>∉ 1,61</b>	9,000	J 76	φ	-33,030,323	12.0270	
33		Total TD&G	\$	152,756,505	\$(24,75	0,557)	-16%	\$4	,319,805,692	3.54%	

.

#### UE Proposed Transmission, Distribution & General Net Salvage Ratios Adjusted for Inflation

<u>Line</u>	Acct. <u>No.</u>	<u>Account</u>	Net Salvage <u>Percent</u> (1)	Net Salvage Percent Adjusted for <u>Inflation*</u> (2)
		Transmission Plant:		
1	352	Structures & Improvements	-5%	-2%
2	353	Station Equipment	0%	0%
3	354	Towers & Fixtures	-10%	-5%
4	355	Poles & Fixtures	-90%	-41%
5	356	OH Conductor & Devices	-25%	-11%
6	359	Road & Trails	0%	0%
		Distribution Plant:		
7	361	Structures & Improvements	-5%	-2%
8	362	Station Equipment	-5%	-2.78
9	364	Poles & Fixtures	-135%	-61%
10	365	OH Conductors & Devices	-50%	-23%
11	366	UG Conduit	-50%	-23%
12	367	UG Conductor & Devices	-25%	-11%
13	368		0%	0%
14	369.1	OH Services	-200%	-90%
15	369.2	UG Services	-80%	-36%
16	370	Meters	0%	0%
17	371	Installation on Customers' Premises	0%	0%
18	373	Street Lighting & Signal Systems	-45%	-20%
		General Plant:		
19	390	Structures & Improvements	-5%	-2%
20	391	Office Furniture & Equipment	0%	0%
21	391.1	Mainframe Computers	0%	0%
22	391.2	Personal Computers	0%	0%
23	392	Transportation Equipment	9%	4%
24	393	Stores Equipment	0%	0%
25	394	Tools, Shop & Garage Equipment	0%	0%
26	395	Laboratory Equipment	0%	0%
27	396	Power Operated Equipment	15%	7%
28	397	Communications Equipment	0%	0%
29	398	Miscellaneous	0%	0%

Note: \* Column (1) X 45%.