Ameren's Response to State of MO - Atty General Data Request MPSC Case No. ER-2007-0002 AmerenUE's Tariff Filing to Increase Rates for Electric Service Provided to Customers in the Company's Missouri Service Area

Requested From: Mike Brosch

Data Request No. AG/UTI-324

<u>Ref: Rebuttal Testimony of AmerenUE witness Mr. Beishir, page 4 (Impact of rate reductions)</u> At page 4 of his Rebuttal, Mr. Beishir states, "Local 1439 supports AmerenUE's rate increase request because it will allow not only our members, but all of us who are the men and women of AmerenUE, to continue to provide the high quality service we have in the past, and more than ever need to do in the future." Please provide the following information:

- a. Has Mr. Beishir conducted any independent evaluation of the appropriate level of rate increase or reduction for AmerenUE in Missouri?
- b. If your response to part (a) is affirmative, please describe the analysis undertaken by Mr. Beishir and provide complete copies of all reports, studies, analyses, projections, workpapers and other documents relied upon by Mr. Beishir to conclude that "AmerenUe's rate increase request" is the appropriate revenue change at this time.
- c. Does Mr. Beishir believe that Local 1439 members will not "continue to provide the high quality service we have in the past" if the Missouri PSC awards a different level of "rate increase" than the amount proposed by AmerenUE?
- d. If your response to part (c) is affirmative, explain and provide copies of all information relied upon in support of your response.

Response:

- a. No.
- b. n/a
- c. I testified that the rate increase would allow quality service to continue. I am confident that Local 1439 members will continue to provide the best service possible, but I am concerned that the rate decrease proposed by Staff would prohibit AmerenUE from investing in its system at the appropriate level. For example, Local 1439 supports the vegetation management programs proposed by Ron Zdellar. If the Commission adopts the recommendation of Staff, that type of work, which will improve the quality of service provided to AmerenUE customers, may not be possible.
- d. n/a

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Missouri Public Service Commission Prepared By: Leo Beishir Title: Business Manager, Local 1439 Date: February 16, 2007

STATE Exhibit No. 526 Case No(s). <u>ER-2007-0007</u> Date 3(29/07 Rptr <u>PE</u>