

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s Tariff to Increase Its Revenues) Case No. ER-2014-0258
for Electric Service.)

**THE OFFICE OF THE PUBLIC COUNSEL’S REQUEST TO
AMEND SCHEDULES TO DIRECT TESTIMONY OF GEOFF MARKE**

COMES NOW the Office of the Public Counsel (Public Counsel) and submits its Request to Amend Schedules to Direct Testimony of Geoff Marke as follows:

1. On December 19, 2014, Public Counsel filed the Direct Testimony of Geoff Marke containing the attached schedules “Attachment GM-3 HC” and “Attachment GM-4 HC” which, out of an abundance of caution, were denoted as “Highly Confidential.”
2. After review of the available information and other testimony filed in the case, Public Counsel has determined that it is not necessary for these schedules to be classified as highly confidential.
3. Therefore, Public Counsel requests that the publicly available attached schedules “Attachment GM-3” and “Attachment GM-4” replace the versions denoted as highly confidential in the Direct Testimony of Geoff Marke.

WHEREFORE, the Office of the Public Counsel gives notice of the filing of the Amended Direct Testimony of Geoff Marke.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 31st day of December, 2014.

/s/ Christina L. Baker

OPC CCOS Study Summary - A&4CP Production Demand Allocator

		TOTAL	RES	SGS	LGS/SPS	LPS	LTS	Lighting
1	O & M EXPENSES	1,780,983,866	766,859,907	183,261,489	508,786,234	157,091,543	150,339,908	14,644,784
2	DEPREC. & AMORT. EXPENSE	437,577,173	205,761,838	49,624,009	117,379,472	32,610,000	26,708,671	5,493,183
3	TAXES	302,650,938	140,898,668	34,126,155	82,465,588	23,286,659	19,025,647	2,848,221
4								
5	TOTAL EXPENSES AND TAXES	2,521,211,977	1,113,520,413	267,011,653	708,631,294	212,988,203	196,074,226	22,986,188
6		0	0	0	0	0	0	0
7	CURRENT RATE REVENUE	2,721,577,249	1,223,648,013	300,866,364	795,379,757	203,762,588	159,372,980	38,547,547
8	OFFSETTING REVENUES:							
9	Reveue Credits	331,025,671	137,136,927	33,007,768	98,995,281	30,409,483	30,284,159	1,192,051
10								
11	Total Offsetting Revenues	331,025,671	137,136,927	33,007,768	98,995,281	30,409,483	30,284,159	1,192,051
12								
11	TOTAL CURRENT REVENUE	3,052,602,920	1,360,784,940	333,874,132	894,375,038	234,172,071	189,657,139	39,739,598
12	CLASS % OF CURRENT REVENUE	100.00%	44.58%	10.94%	29.30%	7.67%	6.21%	1.30%
13								
14	OPERATING INCOME	531,390,943	247,264,528	66,862,480	185,743,744	21,183,868	(6,417,087)	16,753,410
15								
16	TOTAL RATE BASE	7,206,308,103	3,307,968,455	810,777,380	1,999,000,795	569,255,411	466,600,798	52,705,263
17								
18	IMPLICIT RATE OF RETURN	7.37%	7.47%	8.25%	9.29%	3.72%	-1.38%	31.79%
19								
20	EQUAL RATE OF RETURN	7.37%	7.37%	7.37%	7.37%	7.37%	7.37%	7.37%
21								
22	REQUIRED OPERATING INCOME							
23	Equalized (OPC) Rates of Return	531,390,943	243,928,576	59,786,475	147,405,704	41,976,719	34,406,999	3,886,470
24								
25	TOTAL COST OF SERVICE	3,052,602,920	1,357,448,989	326,798,127	856,036,998	254,964,922	230,481,225	26,872,658
26	CLASS % of COS	100.00%	44.47%	10.71%	28.04%	8.35%	7.55%	0.88%
27								
28	MARGIN REVENUE REQUIRED							
29	to Equalize Class ROR - Revenue Neutral	3,052,602,920	1,357,448,989	326,798,127	856,036,998	254,964,922	230,481,225	26,872,658
30								
31	COS INDICATED REVENUE NEUTRAL SHIFT	(0)	(3,335,951)	(7,076,005)	(38,338,040)	20,792,851	40,824,086	(12,866,940)
32	% REVENUE NEUTRAL RATE INCREASE	0.00%	-0.27%	-2.35%	-4.82%	10.20%	25.62%	-33.38%
33	CLASS % OF REVENUE AFTER REVENUE SHIFT	100.00%	44.84%	10.79%	27.82%	8.25%	7.36%	0.94%

OPC CCOS Study Summary - A&E 4NCP Production Demand Allocator

		TOTAL	RES	SGS	LGS/SPS	LPS	LTS	Lighting
1	O & M EXPENSES	1,780,983,866	792,234,313	187,799,213	503,272,827	147,694,283	133,178,363	16,804,867
2	DEPREC. & AMORT. EXPENSE	437,577,173	217,129,580	51,656,911	114,909,463	28,400,024	19,020,293	6,460,901
3	TAXES	302,650,938	148,630,794	35,508,897	80,785,535	20,423,112	13,796,156	3,506,444
4								
5	TOTAL EXPENSES AND TAXES	2,521,211,977	1,157,994,687	274,965,022	698,967,825	196,517,419	165,994,812	26,772,212
6		0	0	0	0	0	0	0
7	CURRENT RATE REVENUE	2,721,577,249	1,223,648,013	300,866,364	795,379,757	203,762,588	159,372,980	38,547,547
8	OFFSETTING REVENUES:							
9	Reveue Credits	331,025,671	150,027,942	35,313,079	96,194,293	25,635,372	21,565,542	2,289,443
10								
11	Total Offsetting Revenues	331,025,671	150,027,942	35,313,079	96,194,293	25,635,372	21,565,542	2,289,443
12								
11	TOTAL CURRENT REVENUE	3,052,602,920	1,373,675,955	336,179,443	891,574,050	229,397,960	180,938,522	40,836,990
12	CLASS % OF CURRENT REVENUE	100.00%	45.00%	11.01%	29.21%	7.51%	5.93%	1.34%
13								
14	OPERATING INCOME	531,390,943	215,681,268	61,214,421	192,606,225	32,880,541	14,943,710	14,064,778
15								
16	TOTAL RATE BASE	7,206,308,103	3,492,619,971	843,798,755	1,958,879,304	500,870,816	341,714,905	68,424,351
17								
18	IMPLICIT RATE OF RETURN	7.37%	6.18%	7.25%	9.83%	6.56%	4.37%	20.56%
19								
20	EQUAL RATE OF RETURN	7.37%	7.37%	7.37%	7.37%	7.37%	7.37%	7.37%
21								
22	REQUIRED OPERATING INCOME							
23	Equalized (OPC) Rates of Return	531,390,943	257,544,722	62,221,461	144,447,157	36,934,060	25,197,952	5,045,591
24								
25	TOTAL COST OF SERVICE	3,052,602,920	1,415,539,409	337,186,482	843,414,983	233,451,479	191,192,764	31,817,802
26	CLASS % of COS	100.00%	46.37%	11.05%	27.63%	7.65%	6.26%	1.04%
27								
28	MARGIN REVENUE REQUIRED							
29	to Equalize Class ROR - Revenue Neutral	3,052,602,920	1,415,539,409	337,186,482	843,414,983	233,451,479	191,192,764	31,817,802
30								
31	COS INDICATED REVENUE NEUTRAL SHIFT	(0)	41,863,454	1,007,040	(48,159,067)	4,053,519	10,254,242	(9,019,187)
32	% REVENUE NEUTRAL RATE INCREASE	0.00%	3.42%	0.33%	-6.05%	1.99%	6.43%	-23.40%
33	CLASS % OF REVENUE AFTER REVENUE SHIFT	100.00%	46.50%	11.09%	27.46%	7.64%	6.23%	1.08%