## AmerenUE's Response to OPC Data Request MPSC Case No. EO-2004-0108 AmerenUE's Application to Transfer Assets to AmerenCIPS

No. 655:

Request From: Ryan Kind

At line 13 on page 2 of his Surrebuttal testimony, Mr. Moore states that "AmerenUE currently has sufficient SO2 allowances to comply with current regulations." Please identify the time period (e.g. 5 years, 10 years or 15 years) that Mr. Moore examined when he concluded that "AmerenUE currently has sufficient SO2 allowances to comply with current regulations."

Response:

The period from 2004 through 2033 was examined.

FILED<sup>4</sup>
APR 1 6 2004

Missouri Publia Service Commission Prepared By: James C. Moore II Title: Sr. Emissions Trader

Date: March 16, 2004

Exhibit No. 48

Case No(s). 20.2004-0108

Date 3-31.04

Rptr + 44

## AmerenUE's Response to OPC Data Request MPSC Case No. EO-2004-0108 AmerenUE's Application to Transfer Assets to AmerenCIPS

No. 656:

Request From: Ryan Kind

At line 13 on page 2 of his Surrebuttal testimony, Mr. Moore states that "AmerenUE currently has sufficient SO2 allowances to comply with current regulations." Please provide copies of any analysis that Mr. Moore created or reviewed in order to conclude that "AmerenUE currently has sufficient SO2 allowances to comply with current regulations." If your response references documents that have already been provided to Public Counsel in prior DR responses, please specify the names and portions (e.g. sheet "UE summary" of Excel file entitled "UE data.xls") of document(s) of documents relied upon by Mr. Moore to reach the conclusion referenced above.

## Response:

The "Inventory" tab and the "Summary" tab on the "Allowance Inventory" spreadsheet.

Prepared By: James C. Moore II Title: Sr. Emissions Trader

Date: March 16, 2004

## AmerenUE's Response to OPC Data Request MPSC Case No. EO-2004-0108 AmerenUE's Application to Transfer Assets to AmerenCIPS

No. 672:

Request From: Ryan Kind

At line 13 on page 2 of his Surrebuttal testimony, Mr. Moore states that "AmerenUE currently has sufficient SO2 allowances to comply with current regulations." What is Mr. Moore's current estimate of the future year when AmerenUE would no longer have "sufficient SO2 allowances to comply with current regulations." Please provide any workpapers relied upon to produce your estimate.

Response: A case could be made for any year between roughly 2010 and 2030 depending on a variety of factors including allowance prices, allowance sales, coal purchases, natural gas prices, plant retirements, electricity prices and numerous other potential impacts.

Prepared By: James C. Moore II Title: Sr. Emissions Trader Date: March 16, 2004