

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) Case No. ER-2008-0318, et al.
Service Provided to Customers in the)
Company's Missouri Service Area.)

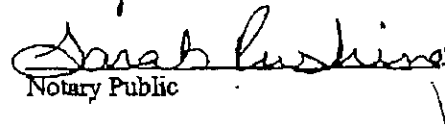
AFFIDAVIT OF DONALD GILJUM

STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Donald Giljum, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 4 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.


Donald Giljum

Subscribed and sworn to before me this 28th day of Aug, 2008.


Notary Public

My commission expires 8/2/2010

Union Exhibit No. 903
Case No(s) ER-20080318
Date 12-3-08 Rptr PR



DIRECT TESTIMONY

OF

DONALD GILJUM

SUBMITTED ON BEHALF OF OE 148 and ALL AMEREN UNIONS

AMEREN

CASE NO. ER-2008-0318, et al.

Q. Please identify yourself and your job title.

A. My name is Donald Giljum. I am the Business Manager for the International Union of Operating Engineers Local Union No. 148 ("OE 148"). I have held this position since 1984. My union represents approximately 1100 workers at AmerenUE, primarily in the power plants, generating electricity.

Q. On whose behalf are you presenting this testimony?

A. I am testifying on behalf of OE 148 and all Ameren local unions. The other unions at Ameren consist of International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439 and 1455, AFL-CIO.

Q. What is the purpose of this testimony?

A. The purpose of my testimony is to support Ameren's petition for a rate increase with one caveat. That is that Ameren be required to maintain an adequately staffed and trained workforce to ensure that its power stations are operated in a safe and reliable manner. I believe it is the Commission's responsibility to correct any short comings that a regulated utility may have with respect to its responsibilities for providing an essential service to its CUSTOMERS.

Q. Please elaborate on AmerenUE's shortcomings as you see them.

A. Ameren had done a disservice to all of its stake holders by letting its internal staffing levels decline to a level where it must now rely more heavily on outside contractors that are less familiar with the work done in its power stations and who do not have the same commitment to serving the public. Additionally, they had severely curtailed their training programs leaving their internal workforce less qualified and therefore less efficient in the performance of their work. AmerenUE had virtually eliminated its internal craft apprentice program relying on hiring employees from other industries to fill these positions when necessary. Unfortunately, many of these people know little or nothing about the unique aspects of working in a generating power station. Before starting that practice, Ameren had, for many years, hire employees into starting positions and trained them internally, allowing AmerenUE the ability to cultivate a knowledgeable and committed employee that over time adapt to the unique working conditions of a 24/7/365 operation and to exposure to numerous workplace hazards beyond those that workers are normally exposed to.

Q. You stated Ameren *had* done a disservice to its stake holders. Has it done something recently that indicates it is correcting this shortcoming?

A. It appears that Ameren is now beginning to try and increase its staffing levels somewhat and is reconsidering its curtailment of training programs. Ameren has recently purchased a new training center for training generating station personnel. And Ameren has finally begun hiring employees to fill vacancies that have existed for several years. However, with the majority of its workforce now close to retirement age, it is unlikely that it will increase the workforce sufficient enough to reduce its substantial reliance on outside contractors which continues to make Ameren's service less reliable than it could be.

Q. Do you have any recommendations to this Commission?

A. Yes. I would like to see the Commission require that Ameren analyze its customary work load (in IBEW parlance, its "normal and sustained work load") giving consideration to the unique nature of generating station work, (i.e., the unexpected breakdown of equipment, which occurs so often that it is more normal than not) and order Ameren to set in place a process by which it will be able to accomplish that customary work load solely using its permanent, direct workforce within the next three years. This will ensure not only that there are sufficient numbers of trained employees for the safe and reliable generation of electricity for Missouri but also that this electricity will be generated largely by Missouri residents.

Q. Does that conclude your testimony?

A. Yes.