

Public Utilities Commission of Ohio Case No. 14-1693-EL-RDR: In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter Into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider.

Public Service Commission of Wisconsin Docket No. 6690-UR-124: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-034-U: In the Matter of an Interim Rate Schedule of Oklahoma Gas and Electric Company Imposing a Surcharge to Recover All Investments and Expenses Incurred Through Compliance with Legislative or Administrative Rules, Regulations, or Requirements Relating to the Public Health, Safety or the Environment Under the Federal Clean Air Act for Certain of its Existing Generation Facilities.

Kansas Corporation Commission Docket No. 15-WSEE-115-RTS: In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company to Make Certain Changes in their Charges for Electric Service.

Michigan Public Service Commission Case No. U-17767: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Public Utility Commission of Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.

Kansas Corporation Commission Docket No. 15-KCPE-116-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Michigan Case No. U-17735: In the Matter of the Application of the Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2014 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; and (4) an Order Granting All Other Required Approvals and Relief.

Kentucky Public Service Commission Case No. 2014-00371: In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates.

Kentucky Public Service Commission Case No. 2014-00372: In the Matter of the Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates.

**2014**

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

West Virginia Case No. 14-1152-E-42T: Appalachian Power Company and Wheeling Power Company, Both d/b/a American Electric Power, Joint Application for Rate Increases and Changes in Tariff Provisions.

Oklahoma Corporation Commission Cause No. PUD 201400229: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Authorization of a Plan to Comply with the Federal Clean Air Act and Cost Recovery; and for Approval of the Mustang Modernization Plan.

**The Midwest Energy Users Group  
Exhibit SWC-1  
Missouri File No. ER-2021-0240**

Missouri Public Service Commission Case No. ER-2014-0258: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase its Revenues for Electric Service.

Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Washington Utilities and Transportation Commission Docket No. UE-141368: In the Matter of the Petition of Puget Sound Energy to Update Methodologies Used to Allocate Electric Cost of Service and For Electric Rate Design Purposes.

Washington Utilities and Transportation Commission Docket No. UE-140762: 2014 Pacific Power & Light Company General Rate Case.

West Virginia Public Service Commission Case No. 14-0702-E-42T: Monongahela Power Company and the Potomac Edison Company Rule 42T Tariff Filing to Increase Rates and Charges.

Ohio Public Utilities Commission Case No. 14-841-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of Case No. 14-841-EL-SSO an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 14AL-0660E: Re: In the Matter of the Advice Letter No. 1672-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective July 18, 2014.

Maryland Case No. 9355: In the Matter of the Application of Baltimore Gas and Electric Company for Authority to Increase Existing Rates and Charges for Electric and Gas Service.

Mississippi Public Service Commission Docket No. 2014-UN-132: In Re: Notice of Intent of Entergy Mississippi, Inc. to Modernize Rates to Support Economic Development, Power Procurement, and Continued Investment.

Nevada Public Utilities Commission Docket No. 14-05004: Application of Nevada Power Company d/b/a NV Energy for Authority to Increase its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Utah Public Service Commission Docket No. 14-035-T02: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service From Renewable Energy Facilities.

Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.

Public Service Commission of Wisconsin Docket No. 6690-UR-123: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Connecticut Docket No. 14-05-06: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Virginia Corporation Commission Case No. PUE-2014-00026: Application of Appalachian Power Company for a 2014 Biennial Review for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Virginia Corporation Commission Case No. PUE-2014-00033: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to Va. Code § 56-249.6.

Arizona Corporation Commission Docket No. E-01345A-11-0224 (Four Corners Phase): In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Minnesota Public Utilities Commission Docket No. E-002/GR-13-868: In the Matter of the Application of Northern States Power Company, for Authority to Increase Rates for Electric Service in Minnesota.

Utah Public Service Commission Docket No. 13-035-184: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Missouri Public Service Commission Case No. EC-2014-0224: In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service.

Oklahoma Corporation Commission Cause No. PUD 201300217: Application of Public Service Company of Oklahoma to be in Compliance with Order No. 591185 Issued in Cause No. PUD 201100106 Which Requires a Base Rate Case to be Filed by PSO and the Resulting Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Public Utilities Commission of Ohio Case No. 13-2386-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.

### 2013

Oklahoma Corporation Commission Cause No. PUD 201300201: Application of Public Service Company of Oklahoma for Commission Authorization of a Standby and Supplemental Service Rate Schedule.

Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.

Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.

Public Utility Commission of Oregon Docket No. UE 267: In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out.

Illinois Commerce Commission Docket No. 13-0387: Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5 of the Public Utilities Act.

Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.

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Exhibit SWC-1  
Missouri File No. ER-2021-0240**

South Dakota Public Utilities Commission Docket No. EL12-061: In the Matter of the Application of Black Hills Power, Inc. for Authority to Increase its Electric Rates. (filed with confidential stipulation)

Kansas Corporation Commission Docket No. 13-WSEE-629-RTS: In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Public Utility Commission of Oregon Docket No. UE 263: In the Matter of PACIFICORP, dba PACIFIC POWER, Request for a General Rate Revision.

Arkansas Public Service Commission Docket No. 13-028-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

Virginia State Corporation Commission Docket No. PUE-2013-00020: Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Florida Public Service Commission Docket No. 130040-El: Petition for Rate Increase by Tampa Electric Company.

South Carolina Public Service Commission Docket No. 2013-59-E: Application of Duke Energy Carolinas, LLC, for Authority to Adjust and Increase Its Electric Rates and Charges.

Public Utility Commission of Oregon Docket No. UE 262: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

New Jersey Board of Public Utilities Docket No. ER12111052: In the Matter of the Verified Petition of Jersey Central Power & Light Company For Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith; and for Approval of an Accelerated Reliability Enhancement Program ("2012 Base Rate Filing")

North Carolina Utilities Commission Docket No. E-7, Sub 1026: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Public Utility Commission of Oregon Docket No. UE 264: PACIFICORP, dba PACIFIC POWER, 2014 Transition Adjustment Mechanism.

Public Utilities Commission of California Docket No. 12-12-002: Application of Pacific Gas and Electric Company for 2013 Rate Design Window Proceeding.

Public Utilities Commission of Ohio Docket Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR: In the Matter of the Application of the Dayton Power and Light Company Approval of its Market Offer.

Minnesota Public Utilities Commission Docket No. E-002/GR-12-961: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

North Carolina Utilities Commission Docket E-2, Sub 1023: In the Matter of Application of Progress Energy Carolinas, Inc. For Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

2012

Public Utility Commission of Texas Docket No. 40443: Application of Southwestern Electric Power Company for Authority to Change Rates and Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2012-218-E: Application of South Carolina Electric & Gas Company for Increases and Adjustments in Electric Rate Schedules and Tariffs and Request for Mid-Period Reduction in Base Rates for Fuel.

Kansas Corporation Commission Docket No. 12-KCPE-764-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Kansas Corporation Commission Docket No. 12-GIMX-337-GIV: In the Matter of a General Investigation of Energy-Efficiency Policies for Utility Sponsored Energy Efficiency Programs.

Florida Public Service Commission Docket No. 120015-El: In Re: Petition for Rate Increase by Florida Power & Light Company.

California Public Utilities Commission Docket No. A.11-10-002: Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Utah Public Service Commission Docket No. 11-035-200: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Virginia State Corporation Commission Case No. PUE-2012-00051: Application of Appalachian Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

Public Utility Commission of Texas Docket No. 39896: Application of Entergy Texas, Inc. for Authority to Change Rates and Reconcile Fuel Costs.

Missouri Public Service Commission Case No. EO-2012-0009: In the Matter of KCP&L Greater Missouri Operations Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism.

Colorado Public Utilities Commission Docket No. 11AL-947E: In the Matter of Advice Letter No. 1597-Electric Filed by Public Service Company of Colorado to Revise its Colorado PUC No. 7-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Changes Effective December 23, 2011.

Illinois Commerce Commission Docket No. 11-0721: Commonwealth Edison Company Tariffs and Charges Submitted Pursuant to Section 16-108.5 of the Public Utilities Act.

Public Utility Commission of Texas Docket No. 38951: Application of Entergy Texas, Inc. for Approval of Competitive Generation Service tariff (Issues Severed from Docket No. 37744).

California Public Utilities Commission Docket No. A.11-06-007: Southern California Edison's General Rate Case, Phase 2.

**2011**

Arizona Corporation Commission Docket No. E-01345A-11-0224: In the Matter of Arizona Public Service Company for a Hearing to Determine the Fair Value of Utility Property of the Company for Ratemaking Purposes, to Fix and Just and Reasonable Rate of Return Thereon, to Approve Rate Schedules Designed to Develop Such Return.

Oklahoma Corporation Commission Cause No. PUD 201100087: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

South Carolina Public Service Commission Docket No. 2011-271-E: Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates and Charges.

Pennsylvania Public Utility Commission Docket No. P-2011-2256365: Petition of PPL Electric Utilities Corporation for Approval to Implement Reconciliation Rider for Default Supply Service.

North Carolina Utilities Commission Docket No. E-7, Sub 989: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Florida Public Service Commission Docket No. 110138: In Re: Petition for Increase in Rates by Gulf Power Company.

Public Utilities Commission of Nevada Docket No. 11-06006: In the Matter of the Application of Nevada Power Company, filed pursuant to NRS 704.110(3) for authority to increase its annual revenue requirement for general rates charged to all classes of customers to recover the costs of constructing the Harry Allen Combined Cycle plant and other generating, transmission, and distribution plant additions, to reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

North Carolina Utilities Commission Docket Nos. E-2, Sub 998 and E-7, Sub 986: In the Matter of the Application of Duke Energy Corporation and Progress Energy, Inc., to Engage in a Business Combination Transaction and to Address Regulatory Conditions and Codes of Conduct.

Public Utilities Commission of Ohio Case Nos. 11-346-EL-SSO, 11-348-EL-SSO, 11-349-EL-AAM, and 11-350-EL-AAM: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form on an Electric Security Plan and In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority.

Virginia State Corporation Commission Case No. PUE-2011-00037: In the Matter of Appalachian Power Company for a 2011 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Illinois Commerce Commission Docket No. 11-0279 and 11-0282 (cons.): Ameren Illinois Company Proposed General Increase in Electric Delivery Service and Ameren Illinois Company Proposed General Increase in Gas Delivery Service.

Virginia State Corporation Commission Case No. PUE-2011-00045: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to § 56-249.6 of the Code of Virginia.

Utah Public Service Commission Docket No. 10-035-124: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Maryland Public Utilities Commission Case No. 9249: In the Matter of the Application of Delmarva Power & Light for an Increase in its Retail Rates for the Distribution of Electric Energy.

Minnesota Public Utilities Commission Docket No. E002/GR-10-971: In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota.

Michigan Public Service Commission Case No. U-16472: In the Matter of the Detroit Edison Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

**2010**

Public Utilities Commission of Ohio Docket No. 10-2586-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 10A-554EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its DSM Plan, Including Long-Term Electric Energy Savings Goals, and Incentives.

Public Service Commission of West Virginia Case No. 10-0699-E-42T: Appalachian Power Company and Wheeling Power Company Rule 42T Application to Increase Electric Rates.

Oklahoma Corporation Commission Cause No. PUD 201000050: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

Georgia Public Service Commission Docket No. 31958-U: In Re: Georgia Power Company's 2010 Rate Case.

Washington Utilities and Transportation Commission Docket No. UE-100749: 2010 Pacific Power & Light Company General Rate Case.

Colorado Public Utilities Commission Docket No. 10M-254E: In the Matter of Commission Consideration of Black Hills Energy's Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Colorado Public Utilities Commission Docket No. 10M-245E: In the Matter of Commission Consideration of Public Service Company of Colorado Plan in Compliance with House Bill 10-1365, "Clean Air-Clean Jobs Act."

Public Service Commission of Utah Docket No. 09-035-15 *Phase II*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Utility Commission of Oregon Docket No. UE 217: In the Matter of PACIFICORP, dba PACIFIC POWER Request for a General Rate Revision.

Mississippi Public Service Commission Docket No. 2010-AD-57: In Re: Proposal of the Mississippi Public Service Commission to Possibly Amend Certain Rules of Practice and Procedure.

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Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET SEQ.* and 8-1-2-42 (a); Authority to Defer Program Costs Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

Public Utility Commission of Texas Docket No. 37744: Application of Entergy Texas, Inc. for Authority to Change Rates and to Reconcile Fuel Costs.

South Carolina Public Service Commission Docket No. 2009-489-E: Application of South Carolina Electric & Gas Company for Adjustments and Increases in Electric Rate Schedules and Tariffs.

Kentucky Public Service Commission Case No. 2009-00459: In the Matter of General Adjustments in Electric Rates of Kentucky Power Company.

Virginia State Corporation Commission Case No. PUE-2009-00125: For acquisition of natural gas facilities Pursuant to § 56-265.4:5 B of the Virginia Code.

Arkansas Public Service Commission Docket No. 10-010-U: In the Matter of a Notice of Inquiry Into Energy Efficiency.

Connecticut Department of Public Utility Control Docket No. 09-12-05: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Arkansas Public Service Commission Docket No. 09-084-U: In the Matter of the Application of Entergy Arkansas, Inc. For Approval of Changes in Rates for Retail Electric Service.

Missouri Public Service Commission Docket No. ER-2010-0036: 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.

Public Service Commission of Delaware Docket No. 09-414: In the Matter of the Application of Delmarva Power & Light Company for an Increase in Electric Base Rates and Miscellaneous Tariff Charges.

**2009**

Virginia State Corporation Commission Case No. PUE-2009-00030: In the Matter of Appalachian Power Company for a Statutory Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Public Service Commission of Utah Docket No. 09-035-15 *Phase I*: In the Matter of the Application of Rocky Mountain Power for Approval of its Proposed Energy Cost Adjustment Mechanism.

Public Service Commission of Utah Docket No. 09-035-23: In the Matter of the Application of Rocky Mountain Power for Authority To Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.

Colorado Public Utilities Commission Docket No. 09AL-299E: Re: The Tariff Sheets Filed by Public Service Company of Colorado with Advice Letter No. 1535 – Electric.



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Arkansas Public Service Commission Docket No. 09-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Oklahoma Corporation Commission Docket No. PUD 200800398: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Public Utilities Commission of Nevada Docket No. 08-12002: In the Matter of the Application by Nevada Power Company d/b/a NV Energy, filed pursuant to NRS §704.110(3) and NRS §704.110(4) for authority to increase its annual revenue requirement for general rates charged to all classes of customers, begin to recover the costs of acquiring the Bighorn Power Plant, constructing the Clark Peakers, Environmental Retrofits and other generating, transmission and distribution plant additions, to reflect changes in cost of service and for relief properly related thereto.

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.

Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

Louisiana Public Service Commission Docket No. U-30192 *Phase II (February 2009)*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

South Carolina Public Service Commission Docket No. 2008-251-E: In the Matter of Progress Energy Carolinas, Inc.'s Application For the Establishment of Procedures to Encourage Investment in Energy Efficient Technologies; Energy Conservation Programs; And Incentives and Cost Recovery for Such Programs.

**2008**

Colorado Public Utilities Commission Docket No. 08A-366EG: In the Matter of the Application of Public Service Company of Colorado for approval of its electric and natural gas demand-side management (DSM) plan for calendar years 2009 and 2010 and to change its electric and gas DSM cost adjustment rates effective January 1, 2009, and for related waivers and authorizations.

Public Service Commission of Utah Docket No. 07-035-93: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Consisting of a General Rate Increase of Approximately \$161.2 Million Per Year, and for Approval of a New Large Load Surcharge.

Indiana Utility Regulatory Commission Cause No. 43374: Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission Approve an Alternative Regulatory Plan for the Offering of Energy Efficiency, Conservation, Demand Response, and Demand-Side Management.

Public Utilities Commission of Nevada Docket No. 07-12001: In the Matter of the Application of Sierra Pacific Power Company for authority to increase its general rates charged to all classes of electric customers to reflect an increase in annual revenue requirement and for relief properly related thereto.

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Louisiana Public Service Commission Docket No. U-30192 *Phase II*: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Colorado Public Utilities Commission Docket No. 07A-420E: In the Matter of the Application of Public Service Company of Colorado For Authority to Implement and Enhanced Demand Side Management Cost Adjustment Mechanism to Include Current Cost Recovery and Incentives.

**2007**

Louisiana Public Service Commission Docket No. U-30192: Ex Parte, Application of Entergy Louisiana, LLC for Approval to Repower Little Gypsy Unit 3 Electric Generating Facility and for Authority to Commence Construction and for Certain Cost Protection and Cost Recovery.

Public Utility Commission of Oregon Docket No. UG 173: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Staff Request to Open an Investigation into the Earnings of Cascade Natural Gas.

**2006**

Public Utility Commission of Oregon Docket No. UE 180/UE 181/UE 184: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Request for a General Rate Revision.

Public Utility Commission of Oregon Docket No. UE 179: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY Request for a general rate increase in the company's Oregon annual revenues.

Public Utility Commission of Oregon Docket No. UM 1129 *Phase II*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

**2005**

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I Compliance*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

Public Utility Commission of Oregon Docket No. UX 29: In the Matter of QWEST CORPORATION Petition to Exempt from Regulation Qwest's Switched Business Services.

**2004**

Public Utility Commission of Oregon Docket No. UM 1129 *Phase I*: Investigation Related to Electric Utility Purchases From Qualifying Facilities.

**TESTIMONY BEFORE LEGISLATIVE BODIES**

**2020**

Regarding Missouri Senate Joint Resolution 34: Written testimony submitted to the Missouri Senate Transportation, Infrastructure and Public Safety Committee, January 30, 2020.

**2019**

Regarding North Carolina Senate Bill 559: Written testimony submitted to the North Carolina Committee on Agriculture/Environment/Natural Resources, April 17, 2019.

Regarding Missouri Senate Joint Resolution 25: Written testimony submitted to the Missouri Senate Committee on Judiciary, March 28, 2019.

Regarding South Carolina House Bill 3659: Written testimony submitted to the South Carolina Senate Committee on Judiciary, March 14, 2019.

Regarding Kansas Senate Bill 69: Written testimony submitted to the Kansas Committee on Utilities, February 19, 2019.

*2018*

Regarding Missouri Senate Bill 564: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 10, 2018.

*2017*

Regarding Missouri Senate Bill 190: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 25, 2017.

*2016*

Regarding Missouri House Bill 1726: Testimony before the Missouri House Energy and Environment Committee, April 26, 2016.

*2014*

Regarding Kansas House Bill 2460: Testimony Before the Kansas House Standing Committee on Utilities and Telecommunications, February 12, 2014.

*2012*

Regarding Missouri House Bill 1488: Testimony Before the Missouri House Committee on Utilities, February 7, 2012.

*2011*

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

#### **AFFIDAVITS**

*2015*

Supreme Court of Illinois, Docket No. 118129, Commonwealth Edison Company et al., respondents, v. Illinois Commerce Commission et al. (Illinois Competitive Energy Association et al., petitioners). Leave to appeal, Appellate Court, First District.

*2011*

Colorado Public Utilities Commission Docket No. 11M-951E: In the Matter of the Petition of Public Service Company of Colorado Pursuant to C.R.S. § 40-6-111(1)(d) for Interim Rate Relief Effective on or before January 21, 2012.

#### **ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

Panelist, US City & Corporate Clean Energy Procurement and its Role in Achieving the Paris Agreement's Goals, United States Environmental Protection Agency, September 1, 2021.

Panelist, WalStreet Fireside Chat – Future of Energy, Bentonville Chamber of Commerce, July 27, 2021.

Panelist, Corporate Customer Partnerships, EEI 2021: The Road to Net Zero, June 9, 2021.

Panelist, Counting to Clean: Corporate Sustainability and Renewable Energy, Energy Bar Association, May 12, 2021.

Speaker, Designing a Customer-Centric Clean Energy Standard, REBA Connect 2021 Virtual Member Summit, May 11, 2021.

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Panelist, Delivering 100% Carbon Free Energy: Options & Issues, Northwestern Center on Law, Business, and Economics, March 16, 2021.

Electric Company Updates and Discussion on Best Practices for Serving National Corporate Customers Webinar, Edison Electric Institute, March 9, 2021.

Panelist, ComEd Fleet Electrification Webinar, December 10, 2020.

Panelist, Corporate Offtaker Perspectives Panel, Southeast Renewable Energy Summit, November 18, 2020.

Panelist, EEI National Key Accounts – Connections that Mean Business for Corporate Customers, EEI Fall National Key Accounts Workshop, October 28, 2020.

Panelist, COVID-19, a Catalyzer or a Barrier to Decarbonization?, Power & Renewables Summit 2020, September 28, 2020.

Panelist, What Organized Markets Can Do for You, REBA Connect: Virtual Member Summit 2020, June 2, 2020.

Panelist, Expanding Future Procurement Options, REBA Connect: Virtual Member Summit 2020, May 13, 2020.

Panelist, Renewable Energy Options for Large Utility Customers, NARUC Center for Partnership & Innovation Webinar Series, January 16, 2020.

Panelist, Pathways to Integrating Customer Clean Energy Demand in Utility Planning, REBA: Market Innovation webinar, January 13, 2020.

Panelist, Should Full Electrification of Energy Systems be Our Goal? If it's No Longer Business as Usual, What Does That Mean for Consumers?, National Association of State Utility Consumer Advocates 2019 Annual Meeting, San Antonio, Texas, November 18, 2019.

Panelist, Fleet Electrification, Federal Utility Partnership Working Group Seminar, Washington, DC, November 8, 2019.

Panelist, Tackling the Challenges of Extreme Weather, Edison Electric Institute Fall National Key Accounts Workshop, Las Vegas, Nevada, October 8, 2019.

Panelist, Fleet Electrification: Tackling the Challenges and Seizing the Opportunities for Electric Trucks, Powering the People 2019, Washington, D.C., September 24, 2019.

Panelist, From the Consumer Perspective, Mid-American Regulatory Conference 2019 Annual Meeting, Des Moines, Iowa, August 13, 2019.

Panelist, Redefining Resiliency: Emerging Technologies Benefiting Customers and the Grid, EPRI 2019 Summer Seminar, Chicago, Illinois, August 12, 2019.

Panelist, Energy Policies for Economic Growth, 2019 Energy Policy Summit, NCSL Legislative Summit, Nashville, Tennessee, August 5, 2019.

Panelist, Gateway to Energy Empowerment for Customers, Illumination Energy Summit, Columbus, Ohio, May 15, 2019.

Panelist, Advancing Clean Energy Solutions Through Stakeholder Collaborations, 2019 State Energy Conference of North Carolina, Raleigh, North Carolina, May 1, 2019.

Panelist, Fleet Electrification: Getting Ready for the Transition, Edison Electric Institute Spring National Key Accounts Workshop, Seattle, Washington, April 8, 2019.

Panelist, Where the Fleet Meets the Pavement, Which Way to Electrification of the U.S. Transportation System?, Washington, D.C., April 4, 2019.

Panelist, Improving Renewable Energy Offerings: What Have We Learned?, Advanced Energy Economy Webinar, March 26, 2019.

Speaker, National Governors Association Southeast Regional Transportation Electrification Workshop, Nashville, Tennessee, March 11, 2019.

Speaker, Walmart Spotlight: A Day in the Life of a National Energy Manager, Touchstone Energy Cooperatives Net Conference 2019, San Diego, California, February 12, 2019.

Panelist, National Accounts: The Struggle is Real, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Getting in Front of Customers Getting Behind the Meter Solutions, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Sustainable Fleets: The Road Ahead for Electrifying Fleet Operations, EEI National Key Accounts 2018 Fall Workshop, San Antonio, Texas, October 23, 2018.

Panelist, Meeting Corporate Clean Energy Requirements in Virginia, Renewable Energy Buyers Alliance Summit, Oakland, California, October 15, 2018.

Panelist, What Are the Anticipated Impacts on Pricing and Reliability in the Changing Markets?, Southwest Energy Conference, Phoenix, Arizona, September 21, 2018.

Speaker, Walmart's Project Gigaton – Driving Renewable Energy Sourcing in the Supply Chain, Smart Energy Decisions Webcast Series, July 11, 2018.

Panelist, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.

Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.

Panelist, The Past, Present, and Future of Renewable Energy: What Role Will PURPA, Mandates, and Collaboration Play as Renewables Become a Larger Part of Our Energy Mix?, 36<sup>th</sup> National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.

Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.

**The Midwest Energy Users Group  
Exhibit SWC-1  
Missouri File No. ER-2021-0240**

Panelist, Getting to Yes with Large Customers to Meet Sustainability Goals, The Edison Foundation Institute for Electric Innovation Powering the People, March 7, 2018.

Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.

Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.

Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.

Panelist, Energy and Climate Change, 2017-18 Arkansas Law Review Symposium: Environmental Sustainability and Private Governance, Fayetteville, Arkansas, October 27, 2017.

Panelist, Customer – Electric Company – Regulator Panel, Edison Electric Institute Fall National Key Accounts Workshop, National Harbor, Maryland, October 12, 2017.

Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.

Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.

Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.

Panelist, Transitioning Away from Traditional Utilities, Utah Association of Energy Users Annual Conference, Salt Lake City, Utah, May 18, 2017.

Panelist, Regulatory Approaches for Integrating and Facilitating DERs, New Mexico State University Center for Public Utilities Advisory Council Current Issues 2017, Santa Fe, New Mexico, April 25, 2017.

Presenter, Advancing Renewables in the Midwest, Columbia, Missouri, April 24, 2017.

Panelist, Leveraging New Energy Technologies to Improve Service and Reliability, Edison Electric Institute Spring National Key Accounts Workshop, Phoenix, Arizona, April 11, 2017.

Panelist, Private Sector Demand for Renewable Power, Vanderbilt Law School, Nashville, Tennessee, April 4, 2017.

Panelist, Expanding Solar Market Opportunities, 2017 Solar Power Colorado, Denver, Colorado, March 15, 2017.

Panelist, Renewables: Are Business Models Keeping Up?, Touchstone Energy Cooperatives NET Conference 2017, San Diego, California, January 30, 2017.

Panelist, The Business Case for Clean Energy, Minnesota Conservative Energy Forum, St. Paul, Minnesota, October 26, 2016.

Panelist, M-RETS Stakeholder Summit, Minneapolis, Minnesota, October 5, 2016.

Panelist, 40<sup>th</sup> Governor's Conference on Energy & the Environment, Kentucky Energy and Environment Cabinet, Lexington, Kentucky, September 21, 2016.

**The Midwest Energy Users Group  
Exhibit SWC-1  
Missouri File No. ER-2021-0240**

Panelist, Trends in Customer Expectations, Wisconsin Public Utility Institute, Madison, Wisconsin, September 6, 2016.

Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

Panelist, Customer Panel, Virginia State Bar 29<sup>th</sup> National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19<sup>th</sup> Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

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Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.

Calculation of FERC Form 1 Reported LGS Revenue Per kWh Sold

Year	LGS Commercial		LGS Industrial		Total LGS			Revenue/kWh Sold (7) (6) / (5) / 1000	Cumulative Increase (%) (8)
	(MWh) (1)	(\$ Revenue) (2)	(MWh) (3)	(\$ Revenue) (4)	(MWh) (5) (1) + (3)	(\$ Revenue) (6) (2) + (4)			
2008	7,217,909	\$ 404,821,983	1,091,791	\$ 63,361,204	8,309,700	\$ 468,183,187	\$ 0.0563		
2009	7,080,575	\$ 423,487,422	942,887	\$ 59,330,101	8,023,462	\$ 482,817,523	\$ 0.0602	6.8%	
2010	7,348,264	\$ 479,441,021	981,778	\$ 66,527,092	8,330,042	\$ 545,968,113	\$ 0.0655	16.3%	
2011	7,273,526	\$ 524,713,967	969,043	\$ 72,008,088	8,242,569	\$ 596,722,055	\$ 0.0724	28.5%	
2012	7,163,079	\$ 523,948,387	941,992	\$ 70,870,800	8,105,071	\$ 594,819,187	\$ 0.0734	30.3%	
2013	7,153,501	\$ 584,937,006	923,052	\$ 77,741,042	8,076,553	\$ 662,678,048	\$ 0.0820	45.6%	
2014	7,238,416	\$ 586,009,104	925,273	\$ 76,899,511	8,163,689	\$ 662,908,615	\$ 0.0812	44.1%	
2015	7,181,050	\$ 614,896,646	915,833	\$ 80,126,654	8,096,883	\$ 695,023,300	\$ 0.0858	52.4%	
2016	7,168,064	\$ 588,880,866	894,348	\$ 75,250,088	8,062,412	\$ 664,130,954	\$ 0.0824	46.2%	
2017	7,017,603	\$ 580,221,852	863,099	\$ 72,888,052	7,880,702	\$ 653,109,904	\$ 0.0829	47.1%	
2018	7,260,729	\$ 613,262,354	864,726	\$ 74,894,444	8,125,455	\$ 688,156,798	\$ 0.0847	50.3%	
2019	6,969,113	\$ 556,156,291	815,896	\$ 67,057,265	7,785,009	\$ 623,213,556	\$ 0.0801	42.1%	
2020	6,375,827	\$ 490,759,257	765,610	\$ 60,705,994	7,141,437	\$ 551,465,251	\$ 0.0772	37.1%	

Sources:  
 2008 - 2020 / Q4 FERC Form 1, Union Electric Company, page 304.



Calculation of Proposed LGS and SP Increases in Excess of Cost of Service Levels

Customer Class	Current Retail Revenues	Proposed Base Revenue Requirement	Proposed Base Revenue Adjustment		Cost of Service Base Revenue Adjustment		Proposed Increase in Excess of Cost of Service
	(5) (1)	(5) (2)	(5) (3) (2) - (1)	(%) (4) (3) / (1)	(%) (5)	(5) (6) (5) X (1)	(5) (7) (3) - (6)
Large General Service	\$ 507,149,139	\$ 567,788,047	\$ 60,638,908	11.96%	1.4%	\$ 7,100,088	\$ 53,538,820
Small Primary Service	\$ 220,416,108	\$ 246,816,373	\$ 26,400,265	11.98%	1.4%	\$ 3,085,826	\$ 23,314,439
<b>Total</b>	<b>\$ 727,565,247</b>	<b>\$ 814,604,420</b>	<b>\$ 87,039,173</b>			<b>\$ 10,185,913</b>	<b>\$ 76,853,260</b>

Sources:

- (1) - (4) Direct Testimony of Michael W. Harding, page 6, Table 3
- (5) Direct Testimony of Michael W. Harding, page 5, Table 2

Calculation of Ameren's Proposed A&E 4NCP Production Plant Cost Allocator

		CP at the Generator (KW)											
		January	February	March	April	May	June	July	August	September	October	November	December
(1)	Residential	2,986,120	3,192,925	2,241,345	2,336,112	2,390,117	3,396,685	3,783,274	3,720,541	2,959,177	1,810,299	2,539,401	3,250,373
(2)	SGS	681,996	589,137	497,452	344,345	622,363	690,346	770,513	755,555	651,204	487,052	495,889	510,920
(3)	LGS	1,410,147	1,348,438	1,021,429	939,796	1,154,802	1,326,601	1,437,696	1,377,867	1,221,104	1,019,123	1,054,258	1,004,661
(4)	SP	523,077	528,403	469,084	473,737	551,379	540,752	587,996	585,266	556,477	489,167	479,898	400,980
(5)	LPS	423,281	425,726	432,374	433,057	502,047	519,075	512,915	530,932	513,243	474,383	419,422	368,339
(6)	Lighting	9,227	49	-	-	-	-	-	-	-	-	36,330	9,743
(7)	Total	6,033,847	6,084,677	4,661,685	4,527,047	5,220,708	6,473,460	7,092,395	6,970,160	5,901,205	4,280,023	5,025,198	5,545,016
(8)	(7) / max(7)	85%	86%	66%	64%	74%	91%	100%	98%	83%	60%	71%	78%
(9)	System Peak Load Rank	5	4	10	11	8	3	1	2	6	12	9	7

Ameren Proposed A&E 4NCP

Step 1: Identify four highest NCP for each class, regardless of month

		Class NCP at the Generator (MW)											
		January	February	March	April	May	June	July	August	September	October	November	December
(10)	Residential	3,239	3,302	2,523	2,336	2,521	3,538	3,941	3,865	3,439	2,191	2,585	3,276
(11)	SGS	716	674	560	452	634	700	824	831	706	561	579	625
(12)	LGS/SP	1,933	1,877	1,628	1,515	1,776	1,971	2,095	2,106	1,911	1,641	1,701	1,699
(13)	LPS	438	435	461	453	511	533	534	538	515	486	450	440
(14)	Lighting	40	38	39	39	39	39	38	38	37	38	36	36
(15)	Σ (10)-(14)	6,366	6,326	5,211	4,794	5,481	6,781	7,433	7,378	6,608	4,917	5,352	6,076

Step 2: Create four class peaks by ordering each selected customer class NCP by largest to smallest and average for each class

		Residential	SGS	LGS/SP	LPS	Lighting	System
(16)	Class Peak #1	3,941	831	2,106	538	40	7,456
(17)	Class Peak #2	3,865	824	2,095	534	39	7,358
(18)	Class Peak #3	3,538	716	1,971	533	39	6,798
(19)	Class Peak #4	3,439	706	1,933	515	39	6,632
(20)	Ave (16)-(19)	3,696	769	2,026	530	39	7,061

Step 3: Adjust annual class MWH usage by losses

(21)	Annual MWH	13,384,649	3,035,720	10,746,717	3,542,170	152,960	30,862,216
(22)	Losses	7,99%	7,99%	6,90%	4,15%	6,92%	7,16%
(23)	(21) X 1-(22)	14,454,222	3,278,306	11,488,104	3,689,239	163,543	33,073,413

Step 4: Calculate average demand for each class (MWH/8760) and class percentage of total system

(24)	(23) / 8760	Average Demand (MW)	1,650	374	1,311	421	19	3,776
(25)	(24) / (24) System	Percent of System	43.70%	9.91%	34.74%	11.15%	0.49%	100.00%

Step 5: Calculate excess demand for each class by subtracting average demand from average of class peaks and class percentage of total system (inc. Ameren lighting adjustment)

(26)	(20) - (24)	Excess Demand (MW)	2,046	395	715	109	5	3,270
(27)	(26) / (24) System	Percent of System	62.57%	12.08%	21.86%	3.33%	0.16%	100.00%

Step 6: Calculate system load factor (based on 1CP)

(28)	(24) System	Average Demand (System)	3,776
(29)	(7) July / 1000	System Peak Demand (July CP)	7,092
(30)	(28) / (29)	System Load Factor	53.23%

Step 7: Multiply average demand percent of system for each class by system load factor to determine average demand contribution to allocator

(31)	(25) X (30)	Average Demand Contribution to Allocator	23.26%	5.28%	18.43%	5.94%	0.26%	53.23%
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Step 8: Multiply excess demand percent of system for each class by 1 minus the system load factor to determine excess demand contribution to allocator

(32)	(27) X 1 - (30)	Excess Demand Contribution to Allocator	29.26%	5.65%	10.22%	1.56%	0.07%	46.77%
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Step 9: Add average demand and excess demand contributions to calculate final allocation percentage for each class

(33)	(31) + (32)	A&E 4NCP Allocator (Ameren)	52.53%	10.93%	28.71%	7.50%	0.34%	100.00%
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Source:  
 CCOS Spreadsheet, A.F.1 -- 4NCP  
 Ameren Missouri Response to MECG 2.1

Calculation of 4NCP A&E Production Plant Cost Allocator per Section 393.1620.1(1) RSMo

		CP at the Generator (kW)											
		January	February	March	April	May	June	July	August	September	October	November	December
(1)	Residential	2,986,120	3,192,925	2,241,345	2,336,112	2,390,117	3,396,585	3,783,274	3,720,541	2,959,177	1,810,299	2,539,401	3,250,373
(2)	SGS	681,996	589,137	497,452	344,345	622,363	690,346	770,513	755,555	651,204	487,052	495,889	510,920
(3)	LGS	1,410,147	1,348,438	1,021,429	939,796	1,154,802	1,326,601	1,437,696	1,377,867	1,221,104	1,019,123	1,054,258	1,004,661
(4)	SP	523,077	528,403	469,084	473,737	551,379	540,752	587,996	585,266	556,477	489,167	479,898	400,980
(5)	LPS	423,281	425,726	432,374	433,057	502,047	519,075	512,915	530,932	513,243	474,383	419,422	368,339
(6)	Lighting	9,227	49	-	-	-	-	-	-	-	-	36,330	9,743
(7)	Total	6,033,847	6,084,677	4,661,685	4,527,047	5,220,708	6,473,460	7,092,395	6,970,160	5,901,205	4,280,023	5,025,198	5,545,016
(8)	(7) / max(7)	85%	86%	66%	64%	74%	91%	100%	98%	83%	60%	71%	78%
(9)	System Peak Load Rank	5	4	10	11	8	1	2	3	6	12	9	7

A&E 4NCP per Language in MRS 393.1620(1)(1)

Step 1: Identify four highest NCP for each class for the four months with the highest system peak loads

		Class NCP at the Generator (MW)											
		January	February	March	April	May	June	July	August	September	October	November	December
(10)	Residential	3,239	3,302	2,523	2,336	2,521	3,538	3,941	3,865	3,439	2,191	2,585	3,276
(11)	SGS	716	674	560	452	634	700	824	831	706	561	579	625
(12)	LGS/SP	1,933	1,877	1,628	1,515	1,776	1,971	2,095	2,106	1,911	1,641	1,701	1,699
(13)	LPS	438	435	461	453	511	533	534	538	515	486	450	440
(14)	Lighting	40	38	39	39	39	39	38	38	37	38	36	36
(15)	Σ (10)-(14)	6,366	6,326	5,211	4,794	5,481	6,781	7,433	7,378	6,608	4,917	5,352	6,076

Step 2: Create four class peaks by ordering each selected customer class NCP by largest to smallest and average for each class

	Residential	SGS	LGS/SP	LPS	Lighting	System
(16)	Class Peak #1	3,941	831	2,106	538	39
(17)	Class Peak #2	3,865	824	2,095	534	38
(18)	Class Peak #3	3,538	700	1,971	533	38
(19)	Class Peak #4	3,302	674	1,877	435	38

(20)	Ave (16)-(19)	Average of Class Peaks	3,662	757	2,012	510	38	6,979
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Step 3: Adjust annual class MWH usage by losses

	Annual MWH	Losses	MWH Adjusted for Losses
(21)	13,384,649	3,035,720	10,746,717
(22)	7.99%	7.99%	6.90%
(23)	(21) X 1+(22)	14,454,222	3,278,306

Step 4: Calculate average demand for each class (MWH/8760) and class percentage of total system

(24)	(23) / 8760	Average Demand (MW)	1,650	374	1,311	421	19	3,776
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(25)	(24) / (24) System	Percent of System	43.70%	9.91%	34.74%	11.15%	0.49%	100.00%
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Step 5: Calculate excess demand for each class by subtracting average demand from average of class peaks and class percentage of total system (inc. Ameren Lighting adjustment)

(26)	(20) - (24)	Excess Demand (MW)	2,012	383	701	89	5	3,189
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(27)	(26) / (24) System	Percent of System	63.08%	12.01%	21.97%	2.79%	0.15%	100.00%
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Step 6: Calculate system load factor (based on 1CP)

(28)	(24) System	Average Demand (System)	3,776
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(29)	(7) July / 3000	System Peak Demand	7,092
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(30)	(28) / (29)	System Load Factor	53.23%
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Step 7: Multiply average demand percent of system for each class by system load factor to determine average demand contribution to allocator

(31)	(23) X (20)	Average Demand Contribution to Allocator	23.26%	5.28%	18.49%	5.94%	0.26%	53.23%
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Step 8: Multiply excess demand percent of system for each class by 1 minus the system load factor to determine excess demand contribution to allocator

(32)	(27) X 1 - (30)	Excess Demand Contribution to Allocator	29.50%	5.62%	10.28%	1.30%	0.07%	46.77%
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Step 9: Add average demand and excess demand contributions to calculate final allocation percentage for each class

(33)	(31) + (32)	A&E 4NCP Allocator (MRS 393.1620(1)(1))	52.76%	10.89%	28.77%	7.24%	0.33%	100.00%
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(34)	(33) - (34)	A&E 4NCP Allocator (Ameren)	52.53%	10.93%	28.71%	7.50%	0.34%	100.00%
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(35)	(33) - (34)	Difference	0.24%	-0.03%	0.05%	-0.25%	0.00%	
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Source:  
 CCOS Spreadsheet, A.F.1 - 4NCP  
 Ameren Missouri Response to MECG 2.1

Calculation of Reasonable CP-Based Allocators

	CP at the Generator (kW)												Average	Allocator		
	January	February	March	April	May	June	July	August	September	October	November	December				
Residential	2,986,120	3,192,925	2,241,345	2,336,112	2,390,117	3,396,685	3,783,274	3,720,541	2,959,177	1,810,299	2,539,401	3,250,373				
SGS	681,996	589,137	497,452	344,345	622,363	690,346	770,513	755,555	651,204	487,052	495,889	510,920				
LGS	1,410,147	1,348,438	1,021,429	939,796	1,154,802	1,326,601	1,437,696	1,377,867	1,221,104	1,019,123	1,054,258	1,004,661				
SP	523,077	528,403	469,084	473,737	551,379	540,752	587,996	585,266	556,477	489,167	479,898	400,980				
LPS	423,281	425,726	432,374	433,057	502,047	519,075	512,915	530,932	513,243	474,383	419,422	368,339				
Lighting	9,227	49	-	-	-	-	-	-	-	-	36,330	9,743				
<b>Total</b>	<b>6,033,847</b>	<b>6,084,677</b>	<b>4,661,685</b>	<b>4,527,047</b>	<b>5,220,708</b>	<b>6,473,460</b>	<b>7,092,395</b>	<b>6,970,160</b>	<b>5,901,205</b>	<b>4,280,023</b>	<b>5,025,198</b>	<b>5,545,016</b>				
Percent of Maximum	85%	86%	66%	64%	74%	91%	100%	98%	83%	60%	71%	78%				
System Peak Load Rank	5	4	10	11	8	3	1	2	6	12	9	7				
<b>1CP</b>																
Residential							3,783,274						3,783,274	53.34%		
SGS							770,513						770,513	10.86%		
LGS/SP							2,025,693						2,025,693	28.56%		
LPS							512,915						512,915	7.23%		
Lighting							-						-	0.00%		
<b>Total</b>							<b>7,092,395</b>						<b>7,092,395</b>	<b>100.00%</b>		
<b>Multiple Coincident Peak (5%)</b>																
Residential							3,783,274	3,720,541						3,751,907	53.36%	
SGS							770,513	755,555						763,034	10.85%	
LGS/SP							2,025,693	1,963,133						1,994,413	28.36%	
LPS							512,915	530,932						521,923	7.42%	
Lighting							-	-						-	0.00%	
<b>Total</b>							<b>7,092,395</b>	<b>6,970,160</b>						<b>7,031,278</b>	<b>100.00%</b>	
<b>Multiple Coincident Peak (10%)</b>																
Residential							3,396,685	3,783,274	3,720,541						3,633,500	53.08%
SGS							690,346	770,513	755,555						738,805	10.79%
LGS/SP							1,867,353	2,025,693	1,963,133						1,952,059	28.52%
LPS							519,075	512,915	530,932						520,974	7.61%
Lighting							-	-	-						-	0.00%
<b>Total</b>							<b>6,473,460</b>	<b>7,092,395</b>	<b>6,970,160</b>						<b>6,845,338</b>	<b>100.00%</b>

Source:  
 Ameren Missouri Response to MECG 2.1

Calculation of Rate of Return Index Values

Customer Class	Rate of Return	RRI
	(%)	
	(1)	(2)
		(1) / (1) Total Company
Residential	3.10%	0.65
Small General Service	5.15%	1.08
Large General Service/Small Primary Service	7.35%	1.54
Large Primary Service	7.70%	1.62
Company Owned Lighting	9.02%	1.89
Customer Owned Lighting	-4.57%	(0.96)
<b>Total Company</b>	<b>4.76%</b>	<b>1.00</b>

Illustrative Example of MCEG Proposed Revenue Allocation, \$77 Million Reduction in Revenue Requirement from Ameren Proposed Increase

Customer Class	Normalized Retail Revenues	Ameren Proposed Base Revenue Requirement	Ameren Proposed Change	Revenue Neutral Shift Required to Reach Cost-Based Rates		50 Percent Of Reduction Used for Revenue Neutral Shift	50 Percent of Reduction Applied on an Equal Percentage Basis to All Classes	Total Revenue Change	Reduction in Subsidy	
Residential	\$ 1,273,043,176	\$ 1,424,590,115	\$ 151,546,939			\$ (19,595,577)	\$ 131,951,362	10.4%		
Small General Service	\$ 274,247,507	\$ 306,941,801	\$ 32,694,294	\$ (4,257,880)	4.5%	\$ (1,729,828)	\$ (4,221,411)	\$ 26,743,055	9.8%	41%
Large General Service	\$ 507,149,139	\$ 567,788,047	\$ 60,638,908	\$ (46,330,076)	48.9%	\$ (18,822,296)	\$ (7,806,397)	\$ 34,010,216	6.7%	41%
Small Primary Service	\$ 220,416,108	\$ 246,816,373	\$ 26,400,265	\$ (20,170,651)	21.3%	\$ (8,194,633)	\$ (3,392,800)	\$ 14,812,832	6.7%	41%
Large Primary Service	\$ 188,575,861	\$ 211,084,406	\$ 22,508,545	\$ (17,855,234)	18.8%	\$ (7,253,960)	\$ (2,902,693)	\$ 12,351,893	6.6%	41%
Company-Owned Lighting	\$ 35,639,800	\$ 39,844,649	\$ 4,204,849	\$ (6,182,552)	6.5%	\$ (2,511,755)	\$ (548,593)	\$ 1,144,501	3.2%	41%
Customer-Owned Lighting	\$ 2,848,591	\$ 3,256,954	\$ 408,363				\$ (43,848)	\$ 364,515	12.8%	
Metropolitan Sewer District	\$ 74,966	\$ 83,955	\$ 8,989				\$ (1,154)	\$ 7,835	10.5%	
<b>Total</b>	<b>\$ 2,501,995,148</b>	<b>\$ 2,800,406,300</b>	<b>\$ 298,411,152</b>	<b>\$ (94,796,393)</b>		<b>\$ (38,512,472)</b>	<b>\$ (38,512,472)</b>	<b>\$ 221,386,208</b>		
<b>Staff Proposed Revenue Requirement Increase</b>			<b>\$ 221,386,208</b>							
<b>Reduction from Ameren Proposed</b>			<b>\$ 77,024,944</b>							
<b>50 Percent of Reduction Used for Revenue Neutral Shift</b>			<b>\$ 38,512,472</b>							
<b>50 Percent of Reduction Applied to All Classes on an Equal % Basis</b>			<b>\$ 38,512,472</b>							
<b>Equal Percentage Reduction</b>									<b>1.5%</b>	

Sources:

Direct Testimony of Lisa M. Ferguson, page 10, line 16

The Midwest Energy Users Group  
 Exhibit SWC-9  
 Missouri File No. ER-2021-0240

Meters:  
 Rate Class: 100  
 Description: Total kWh  
 Location:

Service Period Start Date: 09/16/20 Service Period End Date: 10/15/20

ELECTRIC SERVICE:  
 Assignment:  
 Classification of RATE

Rate Class: 100  
 Description: Rate 1M Large General Service  
 Location:

Service Period Start Date: 09/16/20 Service Period End Date: 10/15/20

CHARGES:	Amount	Rate	Unit Of Meas	Quantity	Description
		.0210	KWH		Seasonal Energy Charge
		2	KW		Demand Charge
		.0009	KWH		Base Energy Charge / Hours Used
		.0452	KWH		Base Energy Charge / Hours Used
		.0316	KWH		Base Energy Charge / Hours Used
					Customer Charge
ALLOWANCE:	Amount	Rate	Unit Of Meas	Quantity	Description
CHARGES:	Amount	Rate	Unit Of Meas	Quantity	Description
					Fuel Adjustment Charge
CHARGES:	Amount	Rate	Unit Of Meas	Quantity	Description
					Energy Efficiency Investment Charge
					Renewable Energy Adjustment
NON-CHARGES:	Amount	Rate	Unit Of Meas	Quantity	Description
TAXES:					Missouri State Sales Tax
TAXES:					Missouri Local Sales Tax
TAXES:					Municipal Charge - Service
*** TOTAL DUE:					

**Cost of Service by Function, Ameren Cost of Service Study Results, Proposed LGS and SP Rates**

Function	Function		Large General Service Revenue by Function		Small Primary Service Revenue by Function	
	Proposed	Proposed	Proposed	Proposed	Proposed	Proposed
	(\$)	(%)	(\$)	(%)	(\$)	(%)
	(1)	(2)	(3)	(4)	(5)	(6)
	(1) / Total		(3) / Total		(5) / Total	
Customer	\$ 18,762	2.5%	\$ 13,563	2.4%	\$ 2,903	1.18%
Production - Demand	\$ 389,287	52.8%				
Transmission - Demand	\$ 61,455	8.3%				
Distribution - Demand	\$ 114,789	15.6%				
Total Demand	\$ 565,531	76.7%	\$ 79,558	14.0%	\$ 23,625	9.57%
Energy	\$ 153,373	20.8%	\$ 474,667	83.6%	\$ 220,289	89.25%
<b>Total Non-EE Revenue</b>	<b>\$ 737,666</b>	<b>100.00%</b>	<b>\$ 567,788</b>	<b>100.0%</b>	<b>\$ 246,816</b>	<b>100.0%</b>

Sources:  
 COSS Spreadsheet, Unbundled Tab  
 Exhibit SWC-10  
 Exhibit SWC-11



**Derivation of Large General Service Revenue Requirement Using Ameren's Proposed Billing Units**

LGS	Billing Units	Rates	Revenue
Customer Charge			
Standard	127,573 \$	105.82 \$	13,499,775
TOD Bills	501 \$	126.91 \$	63,582
Low Income Charge	128,074 \$	0.78 \$	99,898
Demand Charge			
Summer	7,727,878 \$	6.04 \$	46,676,383
Winter	14,679,337 \$	2.24 \$	32,881,715
Energy Charge			
Summer kWh			
First 150 HU	1,016,971,346 \$	0.1085 \$	110,341,391
Next 200 HU	1,089,830,895 \$	0.0816 \$	88,930,201
Over 350 HU	472,781,230 \$	0.0549 \$	25,955,690
On-Peak	5,617,128 \$	0.0114 \$	64,035
Off-Peak	10,806,297 \$	(0.0065) \$	(70,241)
Winter kWh			
First 150 HU	1,654,392,691 \$	0.0682 \$	112,829,582
Next 200 HU	1,770,375,754 \$	0.0506 \$	89,581,013
Over 350 HU	770,481,446 \$	0.0399 \$	30,742,210
Seasonal Energy	408,429,624 \$	0.0399 \$	16,296,342
On-Peak	8,833,444 \$	0.0035 \$	30,917
Off-Peak	18,181,978 \$	(0.0019) \$	(34,546)
Total kWh	7,183,262,986	\$	567,887,946

Sources:  
 Schedule MWH-D3

**Derivation of Small Primary Service Revenue Requirement Using Ameren's Proposed Billing Units**

SP	Billing Units	Rates	Revenue
<b>Customer Charge</b>			
Standard	7,780	\$ 362.60	\$ 2,821,028
TOD Bills	213	\$ 383.68	\$ 81,724
Low Income Charge	7,993	\$ 0.78	\$ 6,235
<b>Demand Charge</b>			
Summer	2,785,023	\$ 5.21	\$ 14,509,970
Winter	5,131,169	\$ 1.89	\$ 9,697,909
<b>Energy Charge</b>			
<b>Summer kWh</b>			
First 150 HU	412,137,993	\$ 0.1053	\$ 43,398,131
Next 200 HU	499,538,596	\$ 0.0793	\$ 39,613,411
Over 350 HU	392,202,496	\$ 0.0532	\$ 20,865,173
On-Peak	12,988,331	\$ 0.0084	\$ 109,102
Off-Peak	28,721,453	\$ (0.0048)	\$ (137,863)
<b>Winter kWh</b>			
First 150 HU	670,717,761	\$ 0.0663	\$ 44,468,588
Next 200 HU	813,483,819	\$ 0.0492	\$ 40,023,404
Over 350 HU	631,304,723	\$ 0.0385	\$ 24,305,232
Seasonal Energy	198,851,110	\$ 0.0385	\$ 7,655,768
On-Peak	22,628,860	\$ 0.0031	\$ 70,149
Off-Peak	45,706,444	\$ (0.0018)	\$ (82,272)
Reactive Charge	1,310,772	\$ 0.39	\$ 511,201
<b>Rider B</b>			
115 kV	6,431	\$ (1.51)	\$ (9,711)
69 kV	847,321	\$ (1.28)	\$ (1,084,571)
<b>Total kWh</b>	<b>3,618,236,498</b>	<b>\$</b>	<b>\$ 246,822,607</b>

Source:  
Schedule MWH-D4

**Derivation of Cost-Based Large General Service Wires Demand Charge**

R1		LGS Base Revenue	\$	567,788,048	
R2		Transmission Portion of Cost, Ameren CCOSS		8.33%	
R3	R1 x R2	Cost-Based Transmission Revenue Requirement	\$	47,302,457	
R4		Demand Billing Determinants		22,407,215	kW
R5	R3 / R4	Cost-Based Transmission Demand Charge	\$	2.11	/kW
R6		Distribution Portion of Cost, Ameren CCOSS		15.56%	
R7	R1 X R6	Cost-Based Distribution Revenue Requirement	\$	88,354,109	
R8		Demand Billing Determinants		22,407,215	kW
R9	R7 / R8	Cost-Based Distribution Demand Charge	\$	3.94	/kW
R10	R5 + R9	<b>Total Wires Distribution Charge</b>	\$	<b>6.05</b>	<b>/kW</b>

Sources:  
 Exhibit SWC-10  
 Exhibit SWC-11

The Midwest Energy Consumers Group  
 Exhibit SWC-14  
 Missouri File No. ER-2021-0240

Calculation of Effective Demand Rates, Proposed LGS Summer

(1)	Rate	LGS Summer		
(2)	Customer Demand	500 kW		
		Summer	Winter	Year Round
(3)	LGS Non-EE Revenues	\$ 276,418,578	\$ 291,369,470	\$ 567,788,048
(4)	% Energy, Cost of Service Study	20.8%	20.8%	20.8%
(5)	(3) x (4) Non-EE Energy Revenues, COS	\$ 57,472,008	\$ 60,560,547	\$ 118,052,555
(6)	Total Billing kWh	2,579,583,471 kWh	4,603,679,515 kWh	7,183,262,986 kWh
(7)	(5) / (6) Cost of Service Energy Rate	\$ 0.02228 /kWh	\$ 0.01316 /kWh	\$ 0.01643 /kWh
(8)	Proposed Billing Demand Rate (BDR)	\$ 6.04 /kW	\$ 2.24 /kW	
(9)	% Demand, Cost of Service Study	76.7%	76.7%	76.7%
(10)	(3) x (9) Non-EE Demand Revenues, COS	\$ 211,916,063	\$ 223,378,152	\$ 435,294,216
(11)	Total Billing kW	7,727,878 kW	14,679,337 kW	22,407,215 kW
(12)	(10) / (11) Full Cost Demand Rate (FCDR)	\$ 27.42 /kW	\$ 15.22 /kW	\$ 19.43 /kW

(13)	Hours of Use	kWh	Load Factor	Proposed Energy Rate	Cost of Service Energy Rate	Demand Portion of Energy Rate	Billed Demand Cost from Energy Rate	Effective Demand Rate from Energy Rate	Total Demand Rate	Effective Subsidy (Received) / Paid
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
				Ex SWC-11		(4) - (5)		(7) / kWh Demand	(8) + BDR	(9) - FCDR
	1	500	0.1%	\$ 0.10850	\$ 0.02228	\$ 0.08622	\$ 43	\$ 0.09	\$ 6.13	\$ (21.30)
	100	50,000	13.9%	\$ 0.10850	\$ 0.02228	\$ 0.08622	\$ 4,311	\$ 8.62	\$ 14.66	\$ (12.76)
	200	100,000	27.8%	\$ 0.08160	\$ 0.02228	\$ 0.05932	\$ 7,950	\$ 15.90	\$ 21.94	\$ (5.48)
	292	146,000	40.6%	\$ 0.08160	\$ 0.02228	\$ 0.05932	\$ 10,678	\$ 21.36	\$ 27.40	\$ (0.03)
	293	146,500	40.7%	\$ 0.08160	\$ 0.02228	\$ 0.05932	\$ 10,708	\$ 21.42	\$ 27.46	\$ 0.03
	300	150,000	41.7%	\$ 0.08160	\$ 0.02228	\$ 0.05932	\$ 10,916	\$ 21.83	\$ 27.87	\$ 0.45
	400	200,000	55.6%	\$ 0.05490	\$ 0.02228	\$ 0.03262	\$ 13,214	\$ 26.43	\$ 32.47	\$ 5.05
	500	250,000	69.4%	\$ 0.05490	\$ 0.02228	\$ 0.03262	\$ 14,845	\$ 29.69	\$ 35.73	\$ 8.31
	600	300,000	83.3%	\$ 0.05490	\$ 0.02228	\$ 0.03262	\$ 16,476	\$ 32.95	\$ 38.99	\$ 11.57
	700	350,000	97.2%	\$ 0.05490	\$ 0.02228	\$ 0.03262	\$ 18,107	\$ 36.21	\$ 42.25	\$ 14.83
	720	360,000	100.0%	\$ 0.05490	\$ 0.02228	\$ 0.03262	\$ 18,433	\$ 36.87	\$ 42.91	\$ 15.48

Sources:  
 Exhibit SWC-10  
 Exhibit SWC-11

Calculating Base Rate Portion of a Summer LGS Bill (Ameren Proposed Rates)

<b>Energy and Demand Data</b>			
Billing Period kWh		291,840	kWh
Billing Period kW		539	kW
<b>Step 1: Determine applicable billing demands</b>			
Immediately Preceding May Total Billing Demand		N/A	kW
Immediately Preceding October Total Billing Demand		N/A	kW
Immediately Preceding Maximum Summer Month Billing Demand		N/A	kW
Base Billing Demand		N/A	kW
Seasonal Billing Demand		N/A	kW
Total Billing Demand = Billing Period kW		539	kW
<b>Step 2: Calculate first energy block kWh (first 150 kWh/kW)</b>			
Billing Period kWh		291,840	kWh
Total Billing Demand		539	kW
Total Billing Demand X 150		80,850	kWh
If Billing Period kWh > Total Billing Demand X 150, First Block is Total Billing Demand X 150		80,850	kWh
If Billing Period kWh < Total Billing Demand X 150, First Block is Billing Period kWh		N/A	kWh
<b>Step 3: Calculate second energy block kWh (next 200 kWh/kW)</b>			
Billing Period kWh		291,840	kWh
Total Billing Demand		539	kW
Total Billing Demand X 200		107,800	kWh
Total Billing Demand X 350		188,650	kWh
If Billing Period kWh > Total Billing Demand X 350, Second Block is Total Billing Demand X 200		107,800	kWh
If Billing Period kWh < Total Billing Demand X 350, Second Block is Billing Period kWh - First Block kWh		N/A	kWh
<b>Step 4: Calculate third energy block kWh (all kWh over 350 kWh/kW)</b>			
Billing Period kWh		291,840	kWh
Total Billing Demand		539	kW
Total Billing Demand X 350		188,650	kWh
If Billing Period kWh > Total Billing Demand X 350, Third Block is Billing Period kWh - First Block kWh - Second Block kWh		103,190	kWh
If Billing Period kWh < Total Billing Demand X 350, There are No kWh in the Third Block		N/A	kWh
<b>Billing Determinants</b>			
Total Billing Demand		539	kW
First Block Energy		80,850	kWh
Second Block Energy		107,800	kWh
Third Block Energy		103,190	kWh
Billing Period kWh (For FAC, EEIC, and REA)		291,840	kWh
<b>Step 5: Multiply Base Rate Charges by Billing Determinants</b>			
Summer Demand Charge (\$/kW)	\$ 6.04	539	\$ 3,255.56
Energy Charge, First 150 kWh/kW (\$/kWh)	\$ 0.1085	80,850	\$ 8,772.23
Energy Charge, Next 200 kWh/kW (\$/kWh)	\$ 0.0816	107,800	\$ 8,796.48
Energy Charge, All kWh Over 350 kWh/kW (\$/kWh)	\$ 0.0549	103,190	\$ 5,665.13
<b>Total Base Rate Cost</b>			<b>\$ 26,489.40</b>

Calculating Base Rate Portion of a Winter LGS Bill (Ameren Proposed Rates)

<b>Energy and Demand Data</b>			
Billing Period kWh		204,480	kWh
Billing Period kW		415	kW
<b>Step 1: Determine applicable billing demands</b>			
Immediately Preceding May Total Billing Demand		407	kW
Immediately Preceding October Total Billing Demand		421	kW
Immediately Preceding Maximum Summer Month Billing Demand		538	kW
Base Billing Demand = Min(Billing Period kW, May kW, October kW, Max Summer kW)		407	kW
Seasonal Billing Demand = Billing Period kW - Base Billing Demand kW		8	kW
Total Billing Demand = Billing Period kW		415	kW
<b>Step 2: Determine seasonal energy</b>			
Seasonal Billing Demand		8	kW
Total Billing Demand		415	kW
Seasonal Billing Demand % of Total Billing Demand		1.9%	
Billing Period kWh		204,480	kWh
Seasonal Energy		3,787	kWh
Remaining Energy for Blocking		200,693	kWh
<b>Step 3: Calculate first energy block kWh (first 150 kWh/kW of Base Billing Demand)</b>			
Remaining Energy for Blocking		200,693	kWh
Base Billing Demand		407	kW
Base Billing Demand X 150		61,056	kWh
If Billing Period kWh > Base Billing Demand X 150, First Block is Base Billing Demand X 150		61,056	kWh
If Billing Period kWh < Base Billing Demand X 150, First Block is Billing Period kWh		N/A	kWh
<b>Step 4: Calculate second energy block kWh (next 200 kWh/kW of Base Billing Demand)</b>			
Remaining Energy for Blocking		200,693	kWh
Base Billing Demand		407	kW
Base Billing Demand X 200		81,408	kWh
Base Billing Demand X 350		142,464	kWh
If Billing Period kWh > Base Billing Demand X 350, Second Block is Base Billing Demand X 200		81,408	kWh
If Billing Period kWh < Base Billing Demand X 350, Second Block is Billing Period kWh - First Block kWh		N/A	kWh
<b>Step 5: Calculate third energy block kWh (all kWh over 350 kWh/kW)</b>			
Remaining Energy for Blocking		200,693	kWh
Base Billing Demand		407	kW
Base Billing Demand X 350		142,464	kWh
If Billing Period kWh > Base Billing Demand X 350, Third Block is Billing Period kWh - First Block kWh - Second Block kWh		58,229	kWh
If Billing Period kWh < Base Billing Demand X 350, There are No kWh in the Third Block		N/A	kWh
<b>Billing Determinants</b>			
Total Billing Demand		415	kW
First Block Energy		61,056	kWh
Second Block Energy		81,408	kWh
Third Block Energy		58,229	kWh
Seasonal Energy		3,787	kWh
Billing Period kWh (For FAC, EEIC, and REA)		204,480	kWh
<b>Step 6: Multiply Base Rate Charges by Billing Determinants</b>			
Winter Demand Charge (\$/kW)	\$ 2.24	415	\$ 928.97
Energy Charge, First 150 kWh/kW (\$/kWh)	\$ 0.0682	61,056	\$ 4,164.02
Energy Charge, Next 200 kWh/kW (\$/kWh)	\$ 0.0506	81,408	\$ 4,119.24
Energy Charge, All kWh Over 350 kWh/kW (\$/kWh)	\$ 0.0399	58,229	\$ 2,323.35
Seasonal Energy Charge, Seasonal kWh	\$ 0.0399	3,787	\$ 151.09
<b>Total Base Rate Cost</b>			<b>\$ 11,686.68</b>

Derivation of MCEG Proposed Rate Design for Large General Service at Ameren's Proposed Revenue Requirement

Current Retail Revenues	\$	507,149,139
Proposed Base Revenue Requirement	\$	567,788,047
% Class Increase		11.96%
3X Class Increase		35.87%

LGS	Billing Units	Present Rates	Proposed Rates	Revenue	Adjust Demand Charges by 3X and Accept Customer and On-Peak/Off-Peak Proposed Changes	% of Energy Charge Revenue	Adjusted Energy Charge Revenues	Resulting Energy Rates
<b>Customer Charge</b>								
Standard	127,573	\$ 94.51	\$ 105.82	\$ 13,499,775	\$ 105.82	\$ 13,499,775		
TOD Bills	501	\$ 115.59	\$ 126.91	\$ 63,582	\$ 126.91	\$ 63,582		
Low Income Charge	128,074	\$ 0.78	\$ 0.78	\$ 99,898	\$ 0.78	\$ 99,898		
<b>Demand Charge</b>								
Summer	7,727,878	\$ 5.40	\$ 6.04	\$ 46,676,383	\$ 7.34	\$ 56,699,478		
Winter	14,679,337	\$ 2.00	\$ 2.24	\$ 32,881,715	\$ 2.72	\$ 39,889,765		
<b>Energy Charge</b>								
<b>Summer kWh</b>								
First 150 HU	1,016,971,346	\$ 0.0969	\$ 0.1085	\$ 110,341,391		23.2% \$ 106,382,399	\$ 0.1046	
Next 200 HU	1,089,830,895	\$ 0.0729	\$ 0.0816	\$ 88,930,201		18.7% \$ 85,739,431	\$ 0.0787	
Over 350 HU	472,781,230	\$ 0.0491	\$ 0.0549	\$ 25,955,690		5.5% \$ 25,024,413	\$ 0.0529	
On-Peak	5,617,128	\$ 0.0114	\$ 0.0114	\$ 64,035	\$ 0.0114	\$ 64,035		
Off-Peak	10,806,297	\$ (0.0065)	\$ (0.0065)	\$ (70,241)	\$ (0.0065)	\$ (70,241)		
<b>Winter kWh</b>								
First 150 HU	1,654,392,691	\$ 0.0609	\$ 0.0682	\$ 112,829,582		23.8% \$ 108,781,314	\$ 0.0658	
Next 200 HU	1,770,375,754	\$ 0.0452	\$ 0.0506	\$ 89,581,013		18.9% \$ 86,366,893	\$ 0.0488	
Over 350 HU	770,481,446	\$ 0.0356	\$ 0.0399	\$ 30,742,210		6.5% \$ 29,639,195	\$ 0.0385	
Seasonal Energy	408,429,624	\$ 0.0356	\$ 0.0399	\$ 16,296,342		3.4% \$ 15,711,638	\$ 0.0385	
On-Peak	8,833,444	\$ 0.0035	\$ 0.0035	\$ 30,917	\$ 0.0035	\$ 30,917		
Off-Peak	18,181,978	\$ (0.0019)	\$ (0.0019)	\$ (34,546)	\$ (0.0019)	\$ (34,546)		
Total kWh	7,183,262,986			\$ 567,887,946		\$ 110,242,663		
					Remaining Revenue	\$ 457,645,283		

Sources:  
Exhibit SWC-3  
Exhibit SWC-11