

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Filed
May 19, 2011
Data Center
Missouri Public
Service Commission

In the Matter of the Tariff Filings of Union)
Electric Company, d/b/a Ameren Missouri, to)
Increase Its Revenues for Retail Electric Service.)

Case No. ER-2011-0028

STATE OF MISSOURI)
CITY OF ST. LOUIS)

AFFIDAVIT OF TIMOTHY D. FINNELL

I, Timothy D. Finnell, duly sworn and on my oath state as follows:

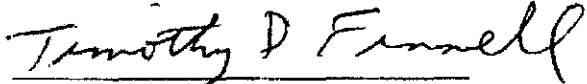
1. My name is Timothy D. Finnell. I am Managing Supervisor, Operations Analysis, for Ameren Services Company, and provide operations analysis services for Union Electric Company d/b/a Ameren Missouri.
2. I have had personal knowledge with respect to the hourly load data reported to the Commission under Commission Rule 4 CSR 240-3.190 (and the hourly load data reported to the Commission under the predecessor rule, 4 CSR 240-20.080), since the early 1990s.
3. From at least the early 1990s until approximately May 2010, after the conclusion of Case No. ER-2010-0036, the hourly load data reported to the Commission was at the generation level, meaning it included both distribution and transmission line losses.
4. During this entire time, the reported data include hourly loads within the entire Union Electric Company control area, meaning it included loads for certain municipal customers and cooperatives, including, e.g., Citizens Electric. The reports specifically included notes that advised the user that the aggregate data was for the entire control area. To obtain Union Electric Company hourly loads at the generation level one simply needed to subtract the non-Union Electric Company loads from the aggregate loads.
5. Consequently, all 3.190 hourly load data in the Commission's/Staff's possession for Case Nos. ER-2007-0002 and ER-2008-0318 was reported at the generation level.
6. Starting approximately May 2010, well after Case No. ER-2008-0318 was over, the Company added additional data to the hourly load data reported under 3.190. After that time, the hourly load data continued to include hourly loads at generation, but an additional column was added that showed the transmission losses (which, along with the distribution losses are included in the hourly loads at generation) separately.

Ameren Exhibit No. 170
Date 5-4-11 Reporter TM
File No. ER-2011-0028

Attachment 1

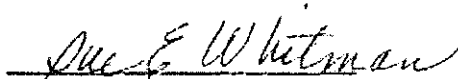
7. Had the 3.190 hourly load data been used in the Staff's fuel modeling in Case Nos. ER-2007-0002 and ER-2008-0318 the loads used in the model necessarily would have had to have been at the generation level because the 3.190 loads were at the generation level.

FURTHER AFFIANT SAYETH NOT.



Timothy D. Finnell

SUBSCRIBED AND SWORN TO before me this 7th day of May, 2011.



Notary Public

