

**Ameren Illinois Company's  
Response to AG Data Requests  
Docket No. 12-0293  
Rate MAP-P Modernization Action Plan - Pricing Annual Update Filing  
Data Request Response Date: 6/21/2012**

AG 3.10

Please update and supplement the Company's response the following Attorney General and/or Staff data requests submitted and answered in Docket No. 12-0001, providing revised information as necessary in connection with updating from 2010 to 2011 data: AG 4.01 Edison Electric Institute Dues.

**RESPONSE**

**Prepared By: Michael J. Getz  
Title: Controller, Ameren Illinois  
Phone Number: 309-677-5111**

See AG 3.10 Attach 1 thru 5.

Docket 12-0001  
AG 4.01

**Ref: AIC Response to ~~AG 1.11~~ AG 3.10; Edison Electric Institute Dues.** Please provide the following additional information regarding EEI dues expensed in ~~2010~~ 2011:

- a) A copy of all invoices paid by Ameren Corporation for EEI dues for calendar ~~2010~~ 2011.
- b) Describe how Ameren Corporation's overall payment of EEI dues are assigned or allocated between Ameren regulated and non-regulated business units and provide supporting calculations for such allocations.
- c) What portion of EEI dues for ~~2010~~ 2011 are utilized to support the legislative monitoring and lobbying activities of EEI?
- d) What ratemaking adjustment would be required, if any, to record EEI legislative affairs costs below the line for ratemaking purposes?
- e) Provide copies of documentation and calculations to support your responses to parts (c) and (d).

**RESPONSE:** (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

**Prepared By: Michael J. Getz**

**Title: Controller, Ameren Illinois**

**Phone Number: 309-677-5111**

- a) The only EEI dues Ameren Corporation paid during ~~2010~~ 2011 were in December ~~2010~~ 2011 for the ~~2011~~ 2012 membership. A copy of the invoice is attached (see ~~AG 4.01 Attach 1~~ AG 3.10 Attach 2). In addition, EEI USWAG dues for 2011 were paid in May 2011. (see AG 3.10 Attach 3 for a copy of the invoice).
- b) The December dues were allocated between ~~Ameren Fuels~~, Ameren Energy Resources Generation, ~~Ameren CILCO~~, ~~Ameren CIPS~~, Genco, GMC, ~~Ameren IP~~, Ameren Illinois, Medina Valley and Ameren UE using the composite allocator 001A in the General Service Agreement. The allocator is based on total sales, customers and employees (see ~~AG 4.01 Attach 2~~ AG 3.10 Attach 4 for the calculation of the 001A composite allocator). The ~~2010~~ 2011 factors used and the portion of the dues paid in ~~2010~~ 2011 which were allocated to each company were as follows:

Corp	Amount	Percent
CIL	\$149,765.00	11.50%
CIP	\$177,634.00	13.64%
IPC	\$334,692.00	25.70%
Ameren Illinois	\$662,091.00	50.84%
AFS	\$9,507.00	0.73%
ARG	\$11,330.00	0.87%
GEN	\$27,088.00	2.08%
GMC	\$54,176.00	4.16%
MV1	\$651.00	0.05%
UEC	\$537,459.00	41.27%
Ameren Total	\$1,302,302.00	100.00%

2011

Corp	Amount	Percent
AIC	\$672,629	51.46%
ARG	\$10,587	0.81%
GEN	\$24,312	1.86%
GMC	\$62,348	4.77%
MV1	\$654	0.05%
UEC	\$536,560	41.05%
Ameren Total	\$1,307,090	100.00%

Of the ~~\$662,091~~ \$672,629 allocated to Ameren Illinois approximately 30% of the costs were allocated to gas leaving ~~\$463,464~~ \$470,840 charged to electric.

The EEI USWAG dues were allocated between using the electric sales allocator 003B in the General Service Agreement (see AG 3.10 Attach 5 for the calculation of the 003B allocator). The 2011 factors used and the portion of the dues paid in 2011 which were allocated to each company were as follows:

2011

Corp	Amount	Percent
AIC	\$26,171	29.74%
GMC	\$23,443	26.64%
UEC	\$38,386	43.62%
Ameren Total	\$88,000	100.00%

Of the \$26,171 allocated to Ameren Illinois approximately 30% of the costs were allocated to gas leaving \$18,320 charged to electric.

- c) Per the footnote on the EEI invoice approximately ~~21%~~ 26% of the ~~\$1,152,093~~ \$1,156,445 dues for regular activities and ~~35%~~ 36% of the ~~\$115,209~~ \$115,645 dues for industry issues are related to influencing legislation.
- d) Ameren Illinois was allocated ~~50.84%~~ 51.46% or ~~\$585,724~~ \$595,107 of the regular activities with 70% charged to electric. The ~~21%~~ 26% portion related to influencing legislation for this cost equals ~~\$86,101~~ \$108,309. Ameren Illinois was allocated ~~50.84%~~ 51.46% or ~~\$58,572~~ \$59,511 of the industry issues with 70% charged to electric. The ~~35%~~ 36% portion related to influencing legislation for this cost equals ~~\$14,350~~ \$14,997. The rate making adjustment to record the costs related to influencing legislation below the line for ratemaking purposes would be ~~\$93,832~~ \$114,761 (sum of ~~\$86,101~~ \$108,309 and ~~\$14,350~~ \$14,997 multiplied by the jurisdictional allocator of ~~93.41%~~ 93.07%). There were no lobbying costs associated with the USWAG dues.
- e) No additional work papers were prepared. The calculations are fully described above.



Edison Electric Institute

*Member by Association*

2011 Contribution to Edison Electric Institute

**Invoice for Membership Dues**

PO 520400

MR. THOMAS R. VOSS  
 CHAIRMAN, PRESIDENT AND CEO  
 AMEREN CORP  
 ONE AMEREN PLZ 1901 CHOUTEAU AVE  
 ST LOUIS, MO 63103-3085

Date	Invoice Number
11/28/2011	DUES201205

Payment due on or before 1/31/2012

Description	Total
<b>2012 EEL Membership Dues for:</b>	
Regular Activities of Edison Electric Institute <sup>1</sup>	\$1,156,445
Industry Issues <sup>2</sup>	115,645
Restore Power <sup>3</sup>	5,000
<b>2012 Contribution to The Thomas Alva Edison Foundation (Edison Foundation), including the Institute for Electric Efficiency<sup>4</sup></b>	<b>30,000</b>
<b>Total</b>	<b>\$1,307,090</b>

**RECEIVED**  
 DEC 08 2011  
**ACCTS. PAYABLE**

- 1- The portion of 2012 membership dues relating to influencing legislation, which is not deductible for federal income tax purposes, is estimated to be 26%.
- 2- The portion of the 2012 industry issues support relating to influencing legislation is estimated to be 36%.
- 3- Restore Power is related to improvements for the rapid response to disasters. No portion of this assessment is allocable to influencing legislation.
- 4- The Edison Foundation is an IRC 501(c)(3) educational and charitable organization. The Institute for Electric Efficiency is a program of the Edison Foundation. Contributions are deductible for federal income tax purpose to the extent provided by law. Please consult your tax advisor with respect to your specific situation.

**PLEASE NOTE INFORMATION FOR ELECTRONIC PAYMENT**

The following instructions should be used when transferring funds electronically to Edison Electric Institute's account at Wells Fargo Bank:

Beneficiary's Bank: Wells Fargo  
 Bank's Address: Washington, DC  
 Bank's ABA Number: 121000248  
 Beneficiary: Edison Electric Institute  
 Beneficiary's Acct No: 2000013842897  
 Beneficiary's Address: 701 Pennsylvania Avenue, NW  
 Washington, DC 20004-2696 USA  
 Beneficiary Reference: 2012 Membership Dues

Please refer any questions to Terri Oliva, EEL Controller: (202) 508-5541 or Toliva@eei.org

# INVOICE



## Edison Electric Institute

701 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20004-2696  
 www.eei.org

Accounts Receivable: 202.508.5428

INVOICE NO: 1826

DATE: MARCH 7, 2011

AMEREN SERVICES  
 P.O. BOX 66149  
 ST. LOUIS, MO 63166-6149  
 PAUL R. PIKE

SALESPERSON	PO NUMBER	DATE SHIPPED	SHIPPED VIA	F.O.B. POINT	TERMS
G. NOVAK	524673	03/07/11			NET 30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	<p align="center"><b>2011 USWAG MEMBERSHIP DUES</b></p> <p>2011 PER SHARE ASSESSMENT = 32,000</p> <p>AMEREN SHARES - 2.75 = \$88,000</p> <p align="center">REFERENCE PO #524673</p> <p>CONTACT: PAUL R. PIKE</p> <p>PH: 314-554-2388</p> <p align="center">PLEASE SEND A COPY OF THIS INVOICE WITH YOUR PAYMENT.</p>		88,000.00
Remit this amount			<b>\$88,000.00</b>

**Ameren Services**  
**Electric/Gas Composite (T&D & Interchg MO/IL)\***

Effective January 2005

updated for January 2011

	<b>Factor 001a</b>									
	<b><u>Total</u></b>	<b><u>ADC-SA</u></b>	<b><u>AMC-SA</u></b>	<b><u>ITC</u></b>	<b><u>AMS-SA</u></b>	<b><u>GEN</u></b>	<b><u>AER</u></b>	<b><u>GMC</u></b>	<b><u>AFS</u></b>	<b><u>UEC-SA</u></b>
003a Elec/Gas Sales (T&D & Interchange MO/IL)	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.32%	0.00%	27.63%
002a # Electric/Gas Customers (T&D & Interchange MO/IL)	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	39.51%
004a Number of Employees	100.00%	0.00%	0.00%	0.00%	0.00%	5.59%	0.00%	0.98%	0.00%	56.01%
Average	100.00%	0.00%	0.00%	0.00%	0.00%	1.86%	0.00%	4.77%	0.00%	41.05%

Updated annually in conjunction with 002a, 003a and 004a

**Ameren**  
**Electric/Gas C**

updated for January 2011

	<u>QST</u>	<u>MV1</u>	<u>ARG</u>	<u>AIC</u>
003a Elec/Gas Sales (T&D & Interchange MO/IL)	0.00%	0.00%	0.00%	59.05%
002a # Electric/Gas Customers (T&D & Interchange MO/IL)	0.00%	0.00%	0.00%	60.49%
004a Number of Employees	0.00%	0.14%	2.44%	34.84%
Average	0.00%	0.05%	0.81%	51.46%

Updated annually in conjunction with 002a, 003a and 004a

**Ameren Services**

**Allocation Factor - # T&D & Interchange Electric/Gas Customers(MO/IL)**

Updated for January 2011

002a # of Customers	<u>Factor 002a</u>					<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>OST</u>	<u>MV1</u>
	<u>Total</u>	<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>							
3,339,656	NA	NA	NA	NA	0	NA	-			1,319,650	NA	0
100.00%					0.00%		0.00%			39.51%		0.00%

Updated annually in conjunction with 002c and 002d

<u>Allocated Direct-E/G Charge Account Allocation:</u>	<u>Customers</u>	
Total Electric	2,396,757	72%
Total Gas	942,899	28%
<b>Total Charge Account</b>	<b>3,339,656</b>	<b>100%</b>

<u>UEC Direct-E/G Charge Acct. Allocation:</u>	<u>Customers</u>	
UEC Electric	1,192,211	90%
UEC Gas	127,439	10%
<b>Total UEC Direct Charge Acct.</b>	<b>1,319,650</b>	<b>100%</b>

<u>UEC Electric State Target Alloc.:</u>	<u>Customers</u>
Missouri Electric (Division 21)	1,192,211

<u>UEC Gas State Target Alloc.:</u>	<u>Customers</u>
Missouri Gas (Division 82)	127,439

<u>AIC Direct-E/G Charge Acct. Allocation:</u>	<u>Customers</u>	
Total AIC Electric	1,204,546	60%
Total AIC Gas	815,460	40%
<b>Total AIC Direct Charge Acct.</b>	<b>2,020,006</b>	<b>100%</b>

<u>ARG</u>	<u>AIC</u>
0	2,020,006
0.00%	60.49%

**Ameren Services**  
**Allocation Factor - E/G BTUs & KWH Sold (IL/MO)**

updated January 2011

	<u>Total</u>	<u>Factor 003a</u>				<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>QST</u>	<u>MVI</u>	<u>ARG</u>
		<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>								
003b Electric KWH	110,542,933,663	NA	NA	NA	NA	215,000	NA	29,447,744,538	-	48,222,824,905	-	-	
003c Gas BTUs	102,385,852	NA	NA	NA	NA	0	NA	-	-	11,923,302	-	-	
<b>Total</b>	<b>110,645,319,515</b>					<b>215,000</b>		<b>29,447,744,538</b>	<b>-</b>	<b>48,234,748,207</b>	<b>-</b>	<b>-</b>	
003b Electric KWH	100.00%					0.00%		26.64%	0	43.62%	0.00%	0.00%	
003c Gas BTUs	100.00%					-		0.00%	0.00%	11.65%	0.00%	0.00%	
<b>Total</b>	<b>200.00%</b>					<b>0.00%</b>		<b>26.64%</b>	<b>0.00%</b>	<b>55.27%</b>	<b>0.00%</b>	<b>0.00%</b>	
<b>Percent</b>	<b>100.00%</b>					<b>0.00%</b>		<b>13.32%</b>	<b>0.00%</b>	<b>27.63%</b>	<b>0.00%</b>	<b>0.00%</b>	

Updated annually in conjunction with 003b and 003c

Conversion Factors:

- 3,412 btu/kwh
- 1,000,000 btu/dekatherm

AIC

32,872,149,220

90,462,550

32,962,611,770

29.74%

88.35%

118.09%

**59.05%**

**Ameren Services**

**Allocation Factor - # of Employees (Management & Contract)**

updated Jan 2011

	<b>Factor 004a</b>												
	<u>Total</u>	<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>	<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>OST</u>	<u>MV1</u>	<u>ARG</u>
# of Employees	7,867	NA	NA	0	NA	440		77		4,406	0	11	192
AMS	1,332												
Total	9,199												
	-												
	100.00%			0.00%		5.59%		0.98%	0.00%	56.01%	0.00%	0.14%	2.44%

Source: Ameren Corporation Monthly Employment Report, Beginning January 2011 from Wanda Bradley

Update annually

AIC  
2,741

34.84%

**Ameren Services**

**Allocation Factor - # T&D & Interchange Electric/Gas Customers(MO/IL)**

dated for January 2011

002a # of Customers	<u>Factor 002a</u>					<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>OST</u>	<u>MV1</u>
	<u>Total</u>	<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>							
3,339,656	NA	NA	NA	NA	0	NA	-			1,319,650	NA	0
100.00%					0.00%		0.00%			39.51%		0.00%

Updated annually in conjunction with 002c and 002d

<u>Allocated Direct-E/G Charge Account Allocation:</u>	<u>Customers</u>	
Total Electric	2,396,757	72%
Total Gas	942,899	28%
<b>Total Charge Account</b>	<b>3,339,656</b>	<b>100%</b>

<u>UEC Direct-E/G Charge Acct. Allocation:</u>	<u>Customers</u>	
UEC Electric	1,192,211	90%
UEC Gas	127,439	10%
<b>Total UEC Direct Charge Acct.</b>	<b>1,319,650</b>	<b>100%</b>

<u>UEC Electric State Target Alloc.:</u>	<u>Customers</u>
Missouri Electric (Division 21)	1,192,211

<u>UEC Gas State Target Alloc.:</u>	<u>Customers</u>
Missouri Gas (Division 82)	127,439

<u>AIC Direct-E/G Charge Acct. Allocation:</u>	<u>Customers</u>	
Total AIC Electric	1,204,546	60%
Total AIC Gas	815,460	40%
<b>Total AIC Direct Charge Acct.</b>	<b>2,020,006</b>	<b>100%</b>

<u>ARC</u>	<u>AIC</u>
0	2,020,006
0.00%	60.49%

**Ameren Services**  
**Allocation Factor - E/G BTUs & KWH Sold (IL/MO)**

updated January 2011

	<u>Total</u>	<u>Factor 003a</u>				<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>QST</u>	<u>MV1</u>	<u>ARG</u>
		<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>								
003b Electric KWH	110,542,933,663	NA	NA	NA	NA	215,000	NA	29,447,744,538	-	48,222,824,905	-	-	
003c Gas BTUs	102,385,852	NA	NA	NA	NA	0	NA	-	-	11,923,302	-	-	
<b>Total</b>	<b>110,645,319,515</b>					<b>215,000</b>		<b>29,447,744,538</b>	<b>-</b>	<b>48,234,748,207</b>	<b>-</b>	<b>-</b>	
003b Electric KWH	100.00%					0.00%		26.64%	0	43.62%	0.00%	0.00%	
003c Gas BTUs	100.00%					-		0.00%	0.00%	11.65%	0.00%	0.00%	
<b>Total</b>	<b>200.00%</b>					<b>0.00%</b>		<b>26.64%</b>	<b>0.00%</b>	<b>55.27%</b>	<b>0.00%</b>	<b>0.00%</b>	
<b>Percent</b>	<b>100.00%</b>					<b>0.00%</b>		<b>13.32%</b>	<b>0.00%</b>	<b>27.63%</b>	<b>0.00%</b>	<b>0.00%</b>	

Updated annually in conjunction with 003b and 003c

Conversion Factors:  
 3,412 btu/kwh  
 1,000,000 btu/dekatherm

AIC

32,872,149,220

90,462,550

32,962,611,770

29.74%

88.35%

118.09%

**59.05%**

**Ameren Services**

**Allocation Factor - # of Employees (Management & Contract)**

updated Jan 2011

	<u>Factor 004a</u>					<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>QST</u>	<u>MV1</u>	<u>ARG</u>
	<u>Total</u>	<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>								
# of Employees	7,867	NA	NA	0	NA	440		77		4,406	0	11	192
AMS	1,332												
Total	9,199												
	100.00%			0.00%		5.59%		0.98%	0.00%	56.01%	0.00%	0.14%	2.44%

Source: Ameren Corporation Monthly Employment Report, Beginning January 2011 from Wanda Bradley

Update annually

AIC  
2,741

34.84%

**Ameren Services**  
**Allocation Factor - Electric KWH Sold (MO/IL)**

updated January 2011

	<u>Total</u>	<u>Factor 003b</u>					<u>GEN</u>	<u>AER</u>	<u>GMC</u>	<u>AFS</u>	<u>UEC-SA</u>	<u>OST</u>	<u>MV1</u>
		<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>								
Million BTUs Sold	110,542,933,663	NA		NA		215,000		29,447,744,538	NA	48,222,824,905	NA	-	
EEI	1,340,460,000												
AMS	3,360,326												
MEP	-												
<b>Total</b>	<b>111,886,753,989</b>												
AMC Consolidated	111,886,753,989												
Difference	-												
	100.00%					0.00%		26.64%		43.62%		0.00%	

Source: CAMC F&S C2-3B -(used CUBE queries due to problem with report)  
 Update annually  
 Use CRS cube queries SRfactor003b#1

KWH Sold		Eliminations	Total KWH Post Elims	
AMS	-	(3,360,326)	(3,360,326)	
EEI	(9,090,898,000)	7,750,438,000	(1,340,460,000)	
MEP	(3,482,000)	3,482,000	-	
EL#EEI#GMC-EL#EEI#GMC	7,989,373,000	(7,989,373,000)	-	0.00%
EL#EEI#MEP-EL#EEI#MEP	3,482,000	(3,482,000)	-	
EL#GMC#MV1-EL#GMC#MV1	14,142,453,240	(14,142,453,240)	-	0.00%
EL#GEN#GMC-EL#GEN#GMC	161,389,956	(161,389,956)	-	
ELAMC	13,450,449,104	(13,450,449,104)	-	0.00%
GEN	(14,142,668,240)	14,142,453,240	(215,000)	0.00%
GMC	(30,635,208,608)	1,187,464,070	(29,447,744,538)	26.64%
AIC	(37,891,801,580)	5,019,652,360	(32,872,149,220)	29.74%
ARG	(7,485,628,000)	7,485,628,000	-	0.00%
MV1	(161,389,956)	161,389,956	-	0.00%
UEC	(48,222,824,905)		(48,222,824,905)	43.62%
Total	(111,886,753,989)	-	(111,886,753,989)	100.00%
Less EEI/AMS			(1,343,820,326)	
Total base factor			(110,542,933,663)	

**Ameren Services**  
**Allocation Factor - Electric KWH Sold (MO/IL)**

updated January 2011

	<u>Total</u>	<u>Factor 003b</u>					<u>AIC</u>
		<u>ADC-SA</u>	<u>AMC-SA</u>	<u>ITC</u>	<u>AMS-SA</u>	<u>ARG</u>	
Million BTUs Sold	110,542,933,663	NA	NA	NA	NA	-	32,872,149,220
EEI	1,340,460,000						
AMS	3,360,326						
MEP	-						
Total	111,886,753,989						
AMC Consolidated	111,886,753,989						
Difference	-						
	100.00%					0.00%	29.74%

Source: CAMC F&S C2-3B -(used CUBE queries due to problem with report)  
 Update annually  
 Use CRS cube queries SRfactor003b#1

KWH Sold		Eliminations	Total KWH Post Elims	
AMS	-	(3,360,326)	(3,360,326)	
EEI	(9,090,898,000)	7,750,438,000	(1,340,460,000)	
MEP	(3,482,000)	3,482,000	-	
EL#EEI#GMC-EL#EEI#GMC	7,989,373,000	(7,989,373,000)	-	0.00%
EL#EEI#MEP-EL#EEI#MEP	3,482,000	(3,482,000)	-	
EL#GMC#MV1-EL#GMC#MV1	14,142,453,240	(14,142,453,240)	-	0.00%
EL#GEN#GMC-EL#GEN#GMC	161,389,956	(161,389,956)	-	
ELAMC	13,450,449,104	(13,450,449,104)	-	0.00%
GEN	(14,142,668,240)	14,142,453,240	(215,000)	0.00%
GMC	(30,635,208,608)	1,187,464,070	(29,447,744,538)	26.64%
AIC	(37,891,801,580)	5,019,652,360	(32,872,149,220)	29.74%
ARG	(7,485,628,000)	7,485,628,000	-	0.00%
MV1	(161,389,956)	161,389,956	-	0.00%
UEC	(48,222,824,905)		(48,222,824,905)	43.62%
Total	(111,886,753,989)	-	(111,886,753,989)	100.00%
Less EEI/AMS			(1,343,820,326)	
Total base factor			(110,542,933,663)	