

Exhibit No.:
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Requirement Cost of Service,
Overview of the Staff's Filing*
Witness: *Lisa M. Ferguson*
Sponsoring Party: *MoPSC Staff*
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

LISA M. FERGUSON

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. ER-2019-0335

*Jefferson City, Missouri
December 4, 2019*

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File No. ER-2019-0335

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OF

LISA M. FERGUSON

**UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI**

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1 the Commission. I have also been responsible for the work product of other Commission
2 employees in rate cases and other regulatory proceedings. Since the time I began my
3 employment with the Commission, I have received training with regard to technical ratemaking
4 matters both in-house and through attending National Association of Regulatory Utility
5 Commissioners ("NARUC") sponsored regulatory seminars as well as other regulatory
6 symposiums and conferences.

7 Q. Have you participated in the Commission Staff's audit of Union Electric
8 Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), concerning its request
9 for a rate decrease in this proceeding?

10 A. Yes, I have, with the assistance of other members of the Staff. I am the financial
11 and business analysis division case coordinator facilitating the work of Staff members within
12 that Division, and I interface and work with the Staff members from other Commission
13 Departments that are involved in the Staff's direct case.

14 **EXECUTIVE SUMMARY**

15 Q. Please summarize your direct testimony in this proceeding.

16 A. I am sponsoring the Staff's Revenue Requirement Cost of Service
17 Report ("Report") and Staff's Direct Accounting Schedules in this proceeding that are being
18 filed concurrently with this direct testimony. I also provide in this direct testimony an overview
19 of the Staff's revenue requirement determination. Staff has conducted a review of all the
20 components (capital structure, return on rate base, rate base, operating revenues and operating
21 expenses) that determine Ameren Missouri's revenue requirement. My testimony provides an
22 overview of Staff's work in each area.

1 **REVENUE REQUIREMENT COST OF SERVICE REPORT**

2 Q. Please explain the organizational format of the Staff's Revenue Requirement
3 Cost of Service Report.

4 A. The Staff's Report has been organized by topic as follows:

5 I. Executive Summary

6 II. Background

7 III. Test Year/True-Up Period

8 IV. Rate of Return (Capital Structure, Cost of Debt, Cost of Equity)

9 V. Rate Base

10 VI. Allocations

11 VII. Income Statement

12 VIII. Depreciation

13 IX. Income Tax

14 X. Fuel Adjustment Clause (FAC)

15 XI. Other Issues

16 The Rate Base and Income Statement sections have numerous subsections which
17 explain each specific area and/or adjustments made by the Staff to the test year ending
18 December 31, 2018. The individual Staff member responsible for each area of Staff's
19 direct case and/or adjustment is identified in the Report following the written discussion he or
20 she authored, and is the expert/witness with respect to that section of the Staff's Report. The
21 Staff may have a different or additional expert/witness for rebuttal or surrebuttal testimony in
22 a given area if this case proceeds to evidentiary hearings.

1 **OVERVIEW OF STAFF'S RECOMMENDED REVENUE REQUIREMENT**

2 Q. How does one determine the revenue requirement for a regulated utility?

3 A. The first step is to calculate the utility's cost of service.

4 Q. In its audit of Ameren Missouri for Case No. ER-2019-0335, has Staff examined
5 all of the components comprising the cost of service for Ameren Missouri's electric operations
6 in Missouri?

7 A. Yes.

8 Q. What are the cost-of-service components that comprise the cost of service for a
9 regulated, investor-owned public utility?

10 A. The cost of service for a regulated, investor-owned public utility can be defined
11 by the following formula:

12
$$\text{Cost of Service} = \text{Cost of Providing Utility Service}$$

13 or

14
$$\text{COS} = \text{O} + (\text{V} - \text{D})\text{R} \quad \text{where,}$$

15
$$\text{COS} = \text{Cost of Service}$$

16 O = Operating Costs (Fuel, Payroll, Maintenance, etc.),
17 Depreciation and Taxes

18 V = Gross Valuation of Property Required for Providing Service
19 (including plant and additions or subtractions of other rate base
20 items)

21 D = Accumulated Depreciation Representing Recovery of
22 Gross Depreciable Plant Investment

23 V - D = Rate Base (Gross Property Investment less Accumulated
24 Depreciation = Net Property Investment)

25 (V - D)R = Return Allowed on Rate Base

26 In the past, the terms "cost of service" and "revenue requirement" have sometimes been
27 used interchangeably. However, in this rate case, Staff will use the term "revenue requirement"

1 to only refer to the utility's necessary incremental change in revenues based on measurement
2 of the utility's current total cost of service compared to its current revenue levels under existing
3 rates.

4 Q. What is the objective of an audit of a regulated, investor-owned public utility for
5 ratemaking purposes?

6 A. The objective of an audit is to determine the appropriate level of the components
7 identified in my previous answer in order to calculate the revenue requirement for such a
8 regulated utility. All relevant factors are examined and a proper relationship of revenues,
9 expenses, and rate base is maintained. The process for making that revenue requirement
10 determination can be summarized as follows:

11 (1) Selection of a test year. The test year income statement represents the
12 starting point for determining a utility's existing annual revenues, operating costs and
13 net operating income. Net operating income represents the return on investment based upon
14 existing rates. The test year approved by this Commission for Case No. ER-2019-0335, is
15 the twelve months ending December 31, 2018. "Annualization," "normalization" and
16 "disallowance" adjustments are made to the test year results when the unadjusted amounts
17 do not fairly represent the utility's most current, ongoing and appropriate annual level of
18 revenues and operating costs. Annualization, normalization and disallowance adjustments are
19 explained in more detail later in this direct testimony. Also, as discussed below, additional
20 information through January 1, 2020, will be considered for inclusion in the cost of service
21 during the true-up audit agreed to by the Parties and ordered by the Commission.

22 (2) Selection of a "test year update period." A proper determination of
23 revenue requirement is dependent upon matching the rate base, return on investment, revenues,

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1 and operating costs components at the same point in time. This ratemaking principle is
2 commonly referred to as the “matching” principle. It is a standard practice in ratemaking in
3 Missouri to utilize a period beyond the established test year in which to match the major
4 components of a utility’s revenue requirement. By updating test year financial results to reflect
5 information beyond the established test year, rates can be set based upon more current
6 information. Due to the length of time between the end of the test year, December 31, 2018,
7 and the true-up cutoff, December 31, 2019, Staff recommended and the parties agreed that an
8 update of June 30, 2019 would be established in this case.

9 (3) Selection of a “true-up date” or “true-up period.” A true-up date generally is
10 established when a significant change in a utility’s cost of service occurs after the end of the
11 test year update period, but prior to the operation-of-law date, and the significant change in cost
12 of service is one the parties and/or Commission has decided should be considered for cost-of-
13 service recognition in the current case. The parties have agreed with a true-up cut-off date of
14 December 31, 2019, except for certain items where a true-up cut-off date of January 1, 2020 is
15 appropriate. For example, in this proceeding, the Company is expecting to experience large
16 decreases in fuel and fuel transportation prices, a wage and salary increase, and an increase in
17 MISO Schedule 26A transmission charges on January 1, 2020. In addition, Ameren Missouri
18 will add a significant amount of plant after the end of the test year, through December 31, 2019.
19 The cost of these and other changes will be considered for inclusion in the cost of service during
20 the true-up audit authorized by the Commission for this case, but substantive issues that can be
21 quantified within the timeframe of the main evidentiary hearings will be tried then and not in
22 the true-up phase of the case.

1 (4) Determination of Rate of Return. A cost-of-capital analysis must be
2 performed to allow Ameren Missouri the opportunity to earn a fair rate of return on its net
3 investment (“rate base”) used in the provision of utility service. Staff witness Jeffrey Smith, of
4 the Commission’s Financial Analysis Department, has performed a cost-of-capital analysis and
5 is sponsoring a section of the Staff’s Revenue Requirement Cost of Service Report to explain
6 and provide the results of his analysis.

7 (5) Determination of Rate Base. Rate base represents the utility’s
8 net investment used in providing utility service, on which the utility is permitted the opportunity
9 to earn a return. For its direct filing, Staff has determined Ameren Missouri’s rate base
10 consistent with the end of the test year established for this case, December 31, 2018, with use
11 of estimated amounts through the true-up cut-off date, December 31, 2019, for plant and
12 depreciation reserve. These estimates will be replaced with actual amounts following the true-
13 up as authorized by the Commission. Other rate base components reflect the last known balance
14 as of September 30, 2019, which will also be replaced with updated amounts following the true-
15 up. Rate base includes plant-in-service (plant fully operational and used for service), cash
16 working capital, materials and supplies, prepayments, fuel inventories, accumulated reserve for
17 depreciation, accumulated deferred income tax, etc.

18 (6) Net Operating Income from Existing Rates. The starting point
19 for determining net income from existing rates is the unadjusted operating revenues, expenses,
20 depreciation, and taxes for the test year which is the twelve-month period ending December
21 31, 2018, for this case. All of the utility’s specific revenue and expense categories are examined
22 to determine whether the unadjusted test year results require adjustments in order to fairly
23 represent the utility’s most current level of operating revenues and expenses.

1 Numerous changes occur during the course of any year that will impact a utility's annual level
2 of operating revenues and expenses. The December 31, 2018, test year has been adjusted to
3 reflect the Staff's determination of the appropriate ongoing levels of revenues and expenses.
4 These items will be re-examined based on actual data as part of the true-up process through
5 December 31, 2019 and for certain items January 1, 2020.

6 (7) Determination of Net Operating Income Required. The net income
7 required for Ameren Missouri is calculated by multiplying the Staff's recommended rate of
8 return by the rate base. Net income required is then compared to net income available from
9 existing rates discussed in Item 6 above. The difference, when factored-up for income taxes,
10 represents the incremental change in the utility's rate revenues required to cover its operating
11 costs and to provide a fair return on investment used in providing electric service.

12 If a utility's current rates are insufficient to cover its operating costs and provide a fair
13 return on investment, the comparison of net operating income required (Rate Base x
14 Recommended Rate of Return) to net income available from existing rates (Operating Revenue
15 less Operating Costs, Depreciation and Income Taxes) will result in a positive amount which
16 would indicate that the utility requires a rate increase. If the comparison results in a negative
17 amount, this indicates that the utility's current rates may be excessive.

18 Q. Please identify the types of adjustments which are made to unadjusted test year
19 results in order to reflect a utility's current annual level of operating revenues and expenses.

20 A. The types of adjustments made to reflect a utility's current annual operating
21 revenues and expenses are:

22 (1) Normalization adjustments. Utility rates are intended to reflect normal
23 ongoing operations. A normalization adjustment is required when the test year reflects the

1 impact of an abnormal event. One example of this type of adjustment that is made in all electric
2 rate cases is the Staff's revenue adjustments to normalize weather. Actual weather conditions
3 during the test year are compared to 30-year "normal" values. The weather normalization
4 adjustment restates the test year sales volumes and revenue levels to reflect normal weather
5 conditions.

6 (2) Annualization adjustments. Annualization adjustments are required
7 when changes have occurred during the test year, update and/or true-up period, which are not
8 fully reflected in the unadjusted test year results. For example, a portion of Ameren Missouri's
9 employees received a wage increase on July 1, 2018. As a result, only a part of the twelve
10 months ending December 31, 2018, reflect the impact of this payroll increase. An adjustment
11 was made to capture the financial impact of the payroll increase for the portion of the test year
12 prior to the wage increase. The test year level of payroll as adjusted for the July 1, 2018, wage
13 increase was then fully annualized to reflect another wage increase that occurred on July 1,
14 2019, for this same portion of Ameren Missouri employees.

15 (3) Disallowance adjustments. Disallowance adjustments are made to
16 eliminate costs in the test year results that are not considered prudent, reasonable, appropriate,
17 and/or not of benefit to Missouri ratepayers and thus not appropriate for recovery from
18 ratepayers. An example in this case is certain executive incentive compensation costs. In the
19 Staff's view, these costs are incurred to primarily benefit shareholder interests and it is not
20 appropriate policy to pass these costs on to customers in rates, since these costs do not benefit
21 ratepayers. Therefore, these costs should be eliminated from the cost of service borne by
22 ratepayers and the Staff has proposed to disallow these costs from recovery in rates.

1 (4) Pro forma adjustments. Pro forma adjustments reflect the impact of items
2 and events that occur subsequent to the test year. These items or events significantly impact the
3 revenue, expense and rate base relationship and should be recognized to address the forward-
4 looking objective of the test year. Caution must be exercised when including pro forma
5 adjustments in a recommended cost of service to ensure that all items and events subsequent to
6 the test year are also examined and any appropriate offsetting adjustments are included as well.
7 In addition, some post-test year items and events may not have occurred yet and/or may not be
8 capable of adequate quantification at the time of the case filing. As a result, quantification of
9 pro forma adjustments may be more difficult than the quantification of other adjustments. As a
10 consequence, use of a true-up audit that considers a full range of auditable items and events that
11 occur subsequent to the test year, attempts to address the maintenance of the proper relationship
12 among revenues, expenses and investment at a consistent point in time is generally a superior
13 approach than considering stand-alone pro forma adjustments for inclusion in cost of service.

14 Q. What rate decrease amount, based on what return on equity (“ROE”) percentage,
15 did the Company request from the Commission in this case?

16 A. Ameren Missouri requested that its annual revenues be decreased by
17 approximately \$774,303, based on an ROE of 9.95%.

18 Q. Please describe Staff’s direct case revenue requirement filing in this proceeding.

19 A. The results of Staff’s audit of Ameren Missouri’s rate case request can be found
20 in the Staff’s filed Accounting Schedules and is summarized on Accounting Schedule 1,
21 Revenue Requirement. This Accounting Schedule shows that the Staff’s recommended
22 revenue requirement for Ameren Missouri in this proceeding is -\$65,051,411 based upon a mid-
23 point recommended rate of return (“ROR”) of 6.921%. Staff is recommending a mid-point

1 ROE of 9.25% with a range of 8.75% to 9.75% as calculated by Staff witness Jeffrey Smith.
2 Staff's revenue requirement at low and high is -\$91,082,165 to -\$39,020,656 based upon a ROR
3 range of 6.67% to 7.17%.

4 Q. What portion of the Staff's recommended decrease in the cost of service is the
5 result of decreasing net fuel expense below the amount currently included in base rates?

6 A. The revenue requirement calculated by Staff includes a decrease of
7 approximately \$101.6 million in the fuel adjustment clause net base energy cost level that was
8 established in permanent rates in Case No. ER-2016-0179. This decrease primarily includes the
9 changes in net fuel costs (fuel expense plus purchased power expense less energy and capacity
10 sales) as well as various other fuel related revenue and cost categories since the December 31,
11 2016, true-up cut-off date in Case No. ER-2016-0179. This decrease also includes the changes
12 in net fuel cost that are estimated to occur through the January 1, 2020, true-up cut-off date in
13 this rate case.

14 "Base rates" are defined as the rate levels established by the Commission in general rate
15 proceedings based upon all relevant factors. If Staff's current recommended revenue
16 requirement in this filing were to be adopted by the Commission, the result would be a reduction
17 to Ameren Missouri customer base rates in the amount of \$65.1 million. Some portion of this
18 decrease is already being reflected as a reduced FAC charge on customers' bills. Staff will
19 continue to examine this area to determine how much of the permanent rate decrease is already
20 being passed on to customers as part of Ameren Missouri's
21 FAC mechanism.

22 Q. What items are included in the Staff's recommended rate base in this case?

1 A. The rate base items include: Plant-in-Service, Accumulated Depreciation
2 Reserve, Cash Working Capital, Materials and Supplies, Prepayments, Fuel Inventories, the
3 unamortized portions of the Energy Efficiency Regulatory Assets, the Plant in Service
4 Accounting (“PISA”) Regulatory Asset, Renewable Energy Credits and Emission Allowances,
5 Over/Undercollected Amortizations, Customer Advances for Construction, Customer Deposits,
6 unamortized Pension and OPEBs Tracking Liabilities, and the Accumulated Deferred Income
7 Tax (“ADIT”) reserve. The Plant and Depreciation Reserve balances reflect the Staff’s
8 estimates through the December 31, 2019, true-up cut-off date. Other rate base items reflect
9 various levels at or beyond the end of the December 31, 2018, test year. These rate base
10 components will be trued-up through December 31, 2019, once the true-up data becomes
11 available.

12 Q. What are the significant income statement adjustments the Staff made in
13 determining Ameren Missouri’s revenue requirement for this case?

14 A. A summary of the Staff’s significant income statement adjustments follows:

15 **Operating Revenues**

16 Retail revenues were adjusted for the elimination of unbilled revenue, the higher income
17 tax rate experienced during the test year, FAC revenue, gross receipts taxes, customer growth,
18 the update period and weather normalization. Other electric revenues were adjusted for coal
19 refinement projects, energy sales, capacity sales, bilateral sales and financial swaps, Midwest
20 Independent System Transmission Operator (“MISO”) Day 2 revenues, transmission revenues,
21 ancillary service market revenues and miscellaneous MISO related revenues. Finally, all
22 Missouri Energy Efficiency Investment Act (“MEEIA”) related revenues and all Keeping

1 Current low-income program revenues that were recorded during the test year were removed
2 from the cost of service calculation.

3 Staff has also addressed a number of other issues in greater detail in the Staff's Revenue
4 Requirement Cost of Service Report as shown in the partial listing below:

5 **Payroll, Payroll Taxes and Employee Benefit Costs**

- 6 • Payroll expense annualized for all known wage increases through
7 January 1, 2020, and changes in employee levels through June 30, 2019.
- 8 • Payroll taxes consistent with the payroll annualization.
- 9 • Incentive compensation and restricted stock awards disallowances.
- 10 • Employee benefits including pensions and OPEBs.

11 **Other Non-Labor Expenses**

- 12 • Fuel, purchased-power and energy sales annualizations to reflect
13 January 1, 2020, coal commodity and coal transportation prices, Staff's
14 recommended market energy prices, and the dispatch of power sources
15 to meet the Staff's determination of Ameren Missouri's generation
16 requirements.
- 17 • Normalization of Rush Island Legal Fees
- 18 • Capacity Expense
- 19 • MISO Transmission and MISO Day 2 Expense
- 20 • Rents and Leases
- 21 • Vegetation Management
- 22 • Low Level Radioactive Waste Expense
- 23 • Callaway Refueling Expense
- 24 • Insurance Expense
- 25 • Property Tax Expense
- 26 • Uncollectible Expense
- 27 • Corporate Allocations
- 28 • Rate case expense adjustment.

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- 1 • Disallowance of all institutional advertising expense, certain dues and
- 2 donations and miscellaneous expenses and Ameren Corporation board
- 3 of directors related costs.
- 4 • Test year storm cost normalization.
- 5 • Elimination of MEEIA expense
- 6 • Income Taxes
- 7 • Depreciation Expense
- 8

9 Q. What reliance did you place on the work or conclusions of other Staff members
10 working on Staff's behalf?

11 A. All of the Staff auditors, including myself, relied on the work from numerous
12 other Staff members in calculating a revenue requirement for Ameren Missouri in this case.
13 Weather-normalized sales and the recommended rate of return are some examples of data and
14 analysis supplied to the Auditing Unit as inputs into the Staff's revenue requirement cost-of-
15 service calculation. Signed affidavits and the qualifications for all Staff members who are
16 responsible for a section of the Staff's Revenue Requirement Cost-of-Service Report and for
17 whom that section constitutes direct testimony in this rate proceeding are attached in an
18 appendix to the Report. Each Staff member who is responsible for a section of the
19 Staff's Revenue Requirement Cost-of-Service Report is identified at the conclusion of the
20 section he or she authored as being the Staff expert/witness responsible for that section.

21 Q. What are the biggest differences between the rate decrease request filed by the
22 Company and the Staff revenue requirement recommendations being filed in this proceeding?

23 A. From the Staff's perspective, there are six primary revenue requirement
24 differences.

- 25 • Update Period Adjustment (Revenue) – Issue Value – (\$77.1 million). Staff has
- 26 included an adjustment to update revenue through the update period of June 30,

1 2019 to reflect all aspects of revenue for the first six months of 2019 before
2 applying its weather, days and other adjustments. Ameren Missouri has not
3 reflected this adjustment in its direct case but will reflect a similar adjustment in
4 its true-up filing.

- 5 • Return on Equity (ROE) and Capital Structure – Issue Value – (\$49.0 million).

6 As previously stated, Ameren Missouri’s return on equity recommendation is
7 9.95%, while the Staff has developed a mid-point recommendation of 9.25%.
8 The dollar difference between Ameren Missouri’s recommended ROE and
9 Staff’s recommended mid-point for ROE, 9.95% compared to 9.25%, is
10 approximately \$49.0 million in revenue requirement.

- 11 • Weather and Days (Revenue) – Issue Value – (\$39.7 million). Staff has adjusted
12 its retail revenue for weather and to reflect 365 days in the year.

- 13 • Payroll – Issue Value – (\$16.8 million). Staff has included Ameren Missouri’s
14 employee headcount as of June 30, 2019. Ameren Missouri did not include an
15 employee headcount adjustment subsequent to February 2019 in its direct filed
16 revenue requirement.

- 17 • Property Tax Expense – Issue Value – (\$14.0 million). Ameren Missouri has
18 reflected a projected property tax expense at the time of the filing of their rate
19 case. Staff has included actual payments made for calendar year 2018.

- 20 • Power Plant Maintenance – Issue Value (\$11.7 million). Due to the high level
21 of maintenance experienced during the test year, Staff has normalized the
22 maintenance on the Sioux, Labadie, and Rush Island generation stations over 6

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1 years as well as normalized the maintenance expense for combustion turbine
2 generators (CTG's) over 5 years.

3 There are other significant differences between the Staff and the Company, based upon
4 their respective direct filings. However, these items are less significant than the differences
5 discussed above.

6 Q. Is it possible that significant differences exist between the Staff's revenue
7 requirement positions and those of other parties besides Ameren Missouri in this proceeding?

8 A. Yes. However, the other parties are filing their prepared direct testimony, if any,
9 concurrently with the Staff's direct filing. Until Staff has a chance to examine the direct
10 testimony of the other parties, it is impossible for the Staff to determine what differences exist
11 and how material they may be.

12 Q. Please identify the Staff experts/witnesses responsible for addressing each area
13 where there is a known and significant difference between Staff and Ameren Missouri as
14 addressed above in this direct testimony.

15 A. The Staff experts/witnesses for each listed issue are as follows:

<u>Issue</u>	<u>Staff Witness</u>
Update Period (Revenue)	Kim Cox
Return on Equity	Jeffrey Smith
Weather and Days (Revenue)	Michael Stahlman/Kim Cox
Payroll	Paul Amenthor
Property Tax Expense	Paul Amenthor
Power Plant Maintenance	Paul Amenthor

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1 Q. When will the Staff be filing its customer class cost of service and rate design
2 direct testimony and report in this proceeding?

3 A. Staff's customer class cost of service and rate design direct testimony and report
4 and schedules will be filed on December 18, 2019.

5 Q. Does this conclude your prepared direct testimony in this proceeding?

6 A. Yes, it does.

7

