

FILED
May 02, 2023
Data Center
Missouri Public
Service Commission

Exhibit No. 112

Staff – Exhibit 112
Amanda C. Conner
True-Up Rebuttal Testimony
File No. ER-2022-0337

Exhibit No.:
Issue(s): Fuel Adjustment Clause
Witness: Amanda C. Conner
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Rebuttal Testimony
Case No.: ER-2022-0337
Date Testimony Prepared: March 24, 2023

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

AMANDA C. CONNER

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

CASE NO. ER-2022-0337

*Jefferson City, Missouri
March 2023*

**** Denotes Confidential Information ****

1 **TRUE-UP REBUTTAL TESTIMONY**

2 **OF**

3 **AMANDA C. CONNER**

4 **UNION ELECTRIC COMPANY,**
5 **d/b/a AMEREN MISSOURI**

6 **CASE NO. ER-2022-0337**

7 Q. Please state your name and business address.

8 A. My name is Amanda C. Conner, and my business address is Missouri Public
9 Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

10 Q. Are you the same Amanda C. Conner who previously provided testimony in
11 this case?

12 A. Yes. I filed direct testimony in the Union Electric Company, d/b/a Ameren
13 Missouri (“Ameren Missouri” or “Company”) current general rate case designated as Case No.
14 ER-2022-0337, on January 10, 2023. I also filed Class Cost of Service (CCOS) direct testimony
15 in the same case on January 24, 2023, rebuttal testimony on February 15, 2023, and
16 surrebuttal/true-up direct testimony on March 13, 2023.

17 **REVISED BASE FACTORS**

18 Q. What is Staff recommending for Ameren Missouri’s True-up summer and winter
19 base factors?

20 A. Staff calculated the true-up summer and winter base factor rates based upon an
21 analysis of data compiled during the 12 months ending December 31, 2022, in Confidential
22 Schedule ACC-tr1. Staff’s updated base factors are:

True-Up Rebuttal Testimony of
Amanda C. Conner

1	• Summer Base Factor:	
2	Net Base Energy Costs	\$187,222,173
3	NSI ^[1]	12,378,566,296
4	Base Factor	\$1.512 per kWh
5	• Winter Base Factor:	
6	Net Base Energy Costs	\$258,401,553
7	NSI	20,100,133,704
8	Base factor	\$1.286 per kWh.

9 Q. Why is Staff updating its recommended base factors again?

10 A. Staff is updating its recommended base factors to reflect the changes made
11 by Staff witnesses Matthew Young and Shawn Lange in their true up rebuttal testimonies
12 and associated fuel run and accounting schedules. These changes are further discussed
13 in Mr. Young and Mr. Lange’s respective true up rebuttal testimonies. This also revised
14 the calculated pass-through percentage of the Midcontinent Independent System Operator
15 (“MISO”) transmission costs and revenues in the fuel adjustment clause (“FAC”) of 6.36% as
16 reflected in Staff witness Shawn Lange’s true up rebuttal testimony filed in this case.

17 Q. Are there any changes in your true up rebuttal testimony due to the recovery of
18 virtual transactions that you previously mentioned in your surrebuttal testimony?¹

19 A. Yes. Once Staff had a chance to review the information received in response to
20 data requests (“DR”) 0546.1 and 0546.2, it is now Staff’s understanding that the use of these

^[1] Net System Input- load forecast at generation level

¹ *Surrebuttal/True-Up Direct Testimony of Amanda C. Conner* filed on March 13, 2023, page 2, line 8 through page 4 line 21.

1 virtual transactions allows Ameren Missouri to manage the market settlement exposure in the
2 day ahead versus real time pricing as a means to lower cost energy. Staff recommends including
3 a normalized level of margins related to virtual transactions in its off-system sales
4 revenue (“OSSR”) and has adjusted the Net Base Energy Costs (“NBEC”) to reflect recovery
5 of ** [REDACTED] **.

6 **CHANGES TO FAC TARIFF**

7 Q. Is there any recommendation Staff would like to make regarding the proposed
8 FAC Rider Sheet No. 71.27?

9 A. Yes. Staff recommends Ameren Missouri include MISO Schedule 43K under
10 the heading of MISO Transmission Service Settlement Schedules.

11 Q. Did Staff make mention of this in previous testimony?

12 A. Yes. In staff witness Claire M. Eubanks’ surrebuttal/true-up direct testimony
13 on page 24, lines 7 through 12, she briefly discusses including MISO Schedule 43K to the
14 FAC tariff.

15 Q. Why does Staff believe MISO Schedule 43K should be included to FAC Rider
16 Sheet No. 71.27?

17 A. It is Staff’s understanding that Ameren Missouri will receive compensation from
18 MISO under Schedule 43K for operating Rush Island as a System Support Resource (“SSR”).
19 In response to Staff DR 459, Ameren Missouri states it records the SSR settlements in
20 FERC account 555. Since this compensation is recorded in FERC account 555, Staff expects
21 these settlements to flow through the FAC.

22 Q. Does this conclude your testimony?

23 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust) Case No. ER-2022-0337
Its Revenues for Electric Service)

AFFIDAVIT OF AMANDA C. CONNER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW AMANDA C. CONNER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Rebuttal Testimony of Amanda C. Conner*; and that the same is true and correct according to her best knowledge and belief.

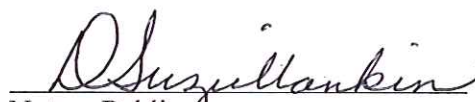
Further the Affiant sayeth not.


AMANDA C. CONNER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 22nd day of March 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public

SCHEDULE ACC-tr1

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY