

Exhibit No. 416

Exhibit No.: 416
Issue(s): DCA/Customer Bills
Witness/Type of Exhibit: Mantle/Direct
Sponsoring Party: Public Counsel
Case No.: GR-2021-0241

DIRECT TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY
D/B/A AMEREN MISSOURI**

FILE NO. GR-2021-0241

September 3, 2021

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Union Electric)
Company d/b/a Ameren Missouri's)
Tariffs to Increase its Revenues for Gas)
Service)
)
)

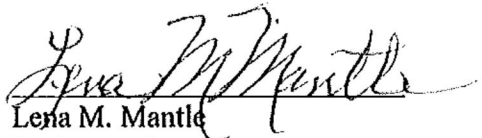
Case No. GR-2021-0241

AFFIDAVIT OF LENA M. MANTLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena M. Mantle, of lawful age and being first duly sworn, deposes and states:

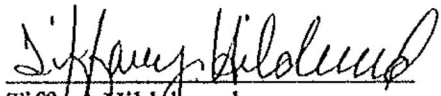
1. My name is Lena M. Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Lena M. Mantle
Senior Analyst

Subscribed and sworn to me this 3rd day of September 2021.



TIFFANY HILDEBRAND
My Commission Expires
August 8, 2023
Coke County
Commission #15637121


Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2023.

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DIRECT TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

FILE NO. GR-2021-0241

1 **INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson
4 City, Missouri 65102.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Missouri Office of the Public Counsel ("OPC") as a Senior
7 Analyst.

8 **Q. On whose behalf are you testifying?**

9 A. I am testifying on behalf of the OPC.

10 **Q. Please describe your experience and your qualifications.**

11 A. I was employed by the OPC in my current position as Senior Analyst in August 2014.
12 In this position, I have provided expert testimony in electric, gas, and water cases
13 before the Commission on behalf of the OPC. I am a Registered Professional
14 Engineer in the State of Missouri.

15 Prior to my employment by the OPC, I worked for the Staff of the Missouri
16 Public Service Commission ("Staff") from August 1983 until I retired as Manager of
17 the Energy Unit in December 2012. During the time of my employment at the
18 Missouri Public Service Commission ("Commission"), I worked as an Economist,
19 Engineer, Engineering Supervisor, and Manager of the Energy Unit.

20 Attached as Schedule LM-D-3 is a brief summary of my experience with
21 OPC and Staff and a list of the Commission cases in which I filed testimony,

1 Commission rulemakings in which I participated, and Commission reports in rate
2 cases to which I contributed as Staff.

3 **Q. What is the purpose of your direct testimony?**

4 A. In this testimony, I recommend the Commission discontinue the Delivery Charge
5 Adjustment mechanism.

6 I also recommend changes to the bills of customers that receive both natural
7 gas and electric service from Union Electric Company d/b/a Ameren Missouri
8 (“Ameren Missouri”) so the customers will be able to easily identify the cost of the
9 electric service separate from the cost of natural gas.

10 **Delivery Charge Adjustment Mechanism**

11 **Q. What is the Delivery Charge Adjustment?**

12 A. The Delivery Charge Adjustment (“DCA”) is an interim rate mechanism that
13 compares the actual amount of billed revenue to the normalized revenue set in the
14 last rate case and, if the revenue amount billed is less than the normalized revenue,
15 Ameren Missouri recovers the difference from its customers through the DCA. If
16 the amount billed is more than the normalized revenue, Ameren Missouri returns
17 the excess to its customers. The mechanism applies to the second block of
18 residential usage (greater than 30 Ccf) and the usage between 101 Ccf and 400 Ccf
19 for the general service customers.

20 **Q. Would you give some background on the DCA?**

21 A. In the last Ameren Missouri general rate case, GR-2019-0077, Staff proposed in its
22 rebuttal the Volume Indifference Reconciliation to Normal (“VIRN”) mechanism
23 due to its concerns with the Weather and Conservation Adjustment Rider
24 (“WCAR”) proposed by Ameren Missouri. A modified VIRN mechanism was
25 agreed to as part of the First Amended Nonunanimous Stipulation and Agreement

1 in that case. The modified VIRN was implemented by Ameren Missouri as the
2 DCA.

3 **Q. What is your recommendation to the Commission regarding the DCA in this**
4 **case?**

5 A. I recommend the Commission discontinue Ameren Missouri's DCA.

6 **Q. Why?**

7 A. It is a decoupling mechanism that is similar to the mechanism requested by Spire,
8 Inc. and denied by the Commission in GR-2017-0215. In that case, Spire proposed
9 the Commission approve a mechanism it called the Revenue Stabilization
10 Mechanism ("RSM") that would have compared the average customer usage as set
11 in the rate case against the actual customer usage. Spire's proposal was in effect
12 decoupling in that it guaranteed Spire a set revenue.

13 **Q. Why did the Commission deny Spire's request?**

14 A. The Commission found that the RSM adjusted rates for all changes in usage and on
15 page 85 of its *Report and Order* in GR-2017-0215 found:

16 The Commission determines that a RSM as proposed by Spire Missouri is
17 not necessary for the company because the utility is not having any
18 difficulty meeting its revenue requirement and has not been shown to be a
19 good mechanism to incentivize conservation. Further, **the RSM as**
20 **proposed is not authorized by the statute.** Therefore, the Commission
21 rejects Spire Missouri's proposed RSM. (emphasis added)

22 **Q. What statute was the Commission referring to?**

23 A. Spire had proposed the RSM for weather and/or conservation under § 386.266.3.

24 **Q. Has Ameren Missouri proposed continuation of the DCA under this statute in**
25 **this case?**

26 A. No. Ameren Missouri has not provided testimony on why the Commission should
27 allow the DCA to continue.

1 **Q. Is the DCA a decoupling mechanism?**

2 A. Yes. While the DCA mechanism does not completely decouple revenue from
3 usage, it is a decoupling mechanism because it guarantees Ameren Missouri the
4 revenue for the blocks of usage with the most variation in usage. Therefore, the
5 Commission should order the DCA be discontinued.

6 **Customer Bills**

7 **Q. What are you recommending the Commission order with regard to customer**
8 **bills?**

9 A. I recommend the Commission order, for the monthly bills of Ameren Missouri electric
10 customers that are also Ameren Missouri natural gas customers, Ameren Missouri
11 clearly and distinctly state which charges are associated with electric service and
12 which charges are associated with gas service along with a total cost of electric service
13 and total cost of gas service. I have attached recent bills of residential and a general
14 service electric and natural gas customer to this testimony as Schedules LMM-D-1
15 and LMM-D-2 to show the myriad of charges on customers' bills and the illogical
16 presentation of the charges. The "Current Charge Detail" of the general service bill is
17 shown below.

Current Charge Detail for Statement 01/21/2021	
Base Energy Chg-Small General 3 Phase	\$271.09
Seasonal Energy Chg-Small General 3 Phase	\$0.00
Gas Energy Charge - General Service	\$43.89
Electric Customer Charge - Small General 3 Phase	\$19.99
Gas Customer Charge - General Service	\$28.44
Renewable Energy Adjustment	\$0.59
Fuel Adjustment Charge	\$0.90
Purchase Gas Adjustment (PGA)	\$62.10
Delivery Charge Adjustment	\$0.52
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$20.22
Jeff City-Cole Co Municipal Charge	\$28.58
Amount Due	\$476.32

18

1 **Q. Which of these charges are for electric service and which are for gas service?**

2 A. The table below shows which charges are electric service charges and which are
3 natural gas service charges.

	<u>Electric</u>	<u>Gas</u>
Base Energy Chg – Small General 3 Phase	X	
Seasonal Energy Chg – Small General 3 Phase	X	
Gas Energy Charge – General Service		X
Electric Customer Charge – Small General 3 Phase	X	
Gas Customer Charge – General Service		X
Renewable Energy Adjustment	X	
Fuel Adjustment Charge	X	
Purchase Gas Adjustment (PGA)		X
Delivery Charge Adjustment		X
Infrastructure Replacement Surcharge		X
Energy Efficiency Investment Charge	X	

4

5 **Q. Is the total charge associated with natural gas service shown on the customer's**
6 **bill?**

7 A. I could not find it on the residential or general service bill.

8 **Q. Is the total charge associated with electric service shown on the customer's**
9 **bill?**

10 A. I could not find it on the residential or general service bill.

11 **Q. Why is it important for customers to easily be able to find how much of their**
12 **Ameren Missouri monthly bill is for electric and how much is for natural gas?**

13 A. Bills provide price signals to customers. When charges for different services are
14 disaggregated and intermingled, price signals and responses to actions and
15 inactions are indistinguishable to customers. Without a separate total for electric
16 and gas separately disclosed on customers' bills, customers cannot tell how much
17 they are saving on their electric service from getting rid of their second refrigerator

1 or from their natural gas service from replacing their old natural gas storage water
2 heater with a demand water heater.

3 Therefore, I recommend the Commission require Ameren Missouri to
4 distinguish on the bills of its electric and natural gas customers, which charges are
5 for electric service, which charges are for natural gas service, and the total bill for
6 electric service separate from natural gas service.

7 **Q. You have attached to this testimony a residential bill and a general service bill.
8 Is your recommendation that the electric and gas service costs be shown only
9 on residential and general service customer bills?**

10 **A.** No. While larger customers have the ability to calculate their electric service cost
11 separately from their natural gas cost, it does not mean that they should have to do
12 so to know the cost of the service provided. The cost of every customer's electric
13 service should be easily identifiable separately from their gas service on their bill
14 and not require customers to do additional calculations.

15 **Q. Does this conclude your direct testimony?**

16 **A.** Yes.



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Current Charge Detail for Statement 07/08/2021

Summer Electric Energy Charge - Residential	\$154.59
Winter Elec Energy Chg 0-750 kWh-Residential	\$0.00
Gas Energy Charge - Residential	\$0.00
Electric Customer Charge - Residential	\$9.06
Gas Customer Charge - Residential	\$15.00
Renewable Energy Adjustment	\$0.22
Fuel Adjustment Charge	\$4.03
Purchase Gas Adjustment (PGA)	\$0.00
Delivery Charge Adjustment	\$0.00
Infrastructure Replacement Surchage	\$0.00
Energy Efficiency Investment Charge	\$6.96
Missouri Local Sales Tax	\$1.90
Jeff City-Cole Co Municipal Charge	\$12.12
Credit	-\$4.17
Amount Due	\$199.71

AMOUNT DUE \$199.71

Due Date: 07/29/2021

Account Number _____
 Customer Name _____
 Service Address _____

Previous Statement \$0.00
 P-PGA \$0.46020000 per CCF



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Electric Service from 06/06/2021 - 07/08/2021 30 Days

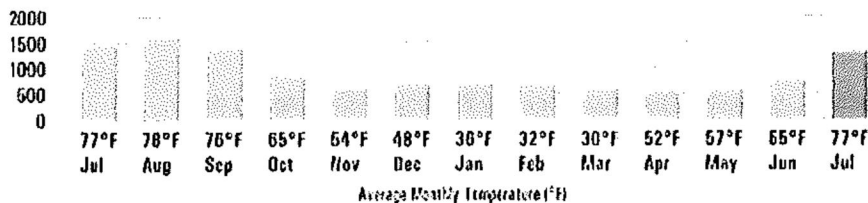
Gas Service from 06/06/2021 - 07/08/2021 30 Days

Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
E	027507	026193	1309 kWh	Actual
G	005001	005001	0 CCF	Actual

Electric Service Details

July Statement

Electric Usage in Kilowatt Hours (kWh)



Electric Usage Summary (kWh)

So far this year, you're using 4.4% less than last year



2020 5,392 kWh

2021 5,156 kWh

Usage from Jan-Jul for 2020 & 2021



58650 12073
 07152 6574485 001153 002205 00010001
 INTERNAL USE ONLY

>> See reverse for messages

Page 1 of 1



Check if you have address changes on back.

Please return this portion with your payment.

AMOUNT DUE	Due Date
\$199.71	July 20, 2021
Delinquent Amount After Due Date	Account Number
\$202.89	_____

Amount Enclosed: \$



AMEREN MISSOURI
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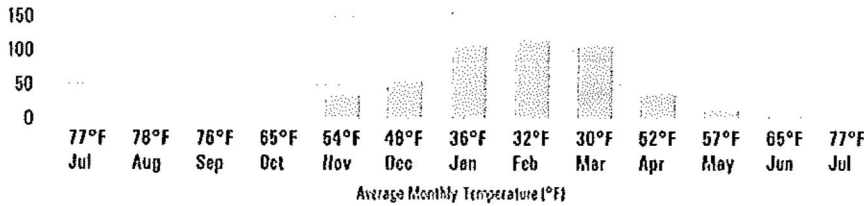
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Gas Service Details

July Statement

Gas Usage in Cubic Foot (CCF)



Gas Usage Summary (CCF)

So far this year, you're using 12.8% less than last year



2020 438 CCF

2021 382 CCF

Usage from Jan-Jul for 2020 & 2021

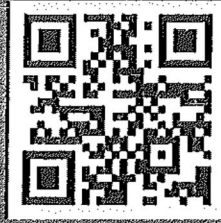
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To get the details and find a participating contractor, scan the QR code or visit:

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Offer applies only to qualifying purchases.



Account Messages

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.

Important Message for Gas Customers - Be Safe!

If you ever smell gas, leave the area and call Ameren Missouri at 1.800.552.7583 to investigate the problem. Before you dig, call 1.800.DIG.RITE to locate underground gas pipelines for you.



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 City, State, Zip _____
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Current Charge Details for Statement 04/21/2021

Base Energy Chg-Small General 3 Phase	\$271.09
Seasonal Energy Chg-Small General 3 Phase	\$0.00
Gas Energy Charge - General Service	\$43.89
Electric Customer Charge - Small General 3 Phase	\$19.99
Gas Customer Charge - General Service	\$28.44
Renewable Energy Adjustment	\$0.59
Fuel Adjustment Charge	\$0.90
Purchase Gas Adjustment (PGA)	\$62.10
Delivery Charge Adjustment	\$0.52
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$20.22
Jeff City-Cole Co Municipal Charge	\$28.58
Amount Due	\$476.32

AMOUNT DUE \$476.32

Due Date: 05/12/2021

Account Number _____
 Customer Name _____
 Service Address _____

Previous Statement \$673.63
 Last Payment - 04/05/2021 \$673.63
 P-PGA \$0.43126855 per CCF



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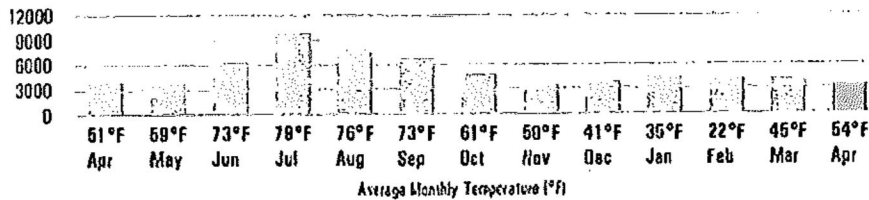
Electric Service from 03/21/2021 - 04/19/2021 20 Days

Gas Service from 03/21/2021 - 04/19/2021 20 Days

Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
007331	007302	007302	3480 kWh	Actual
002375	002231	002231	144 CCF	Actual

Electric Service Details April Statement

Electric Usage in Kilowatt Hours (kWh)



Electric Usage Summary (kWh)

So far this year, you're using 21.5% less than last year



2020 20,610 kWh
 2021 16,200 kWh
 Usage from Jan-Apr for 2020 & 2021

18493 41493 13073
 X3305 6553185 003306 006811 00070001
 10/20/21 11:55 AM V



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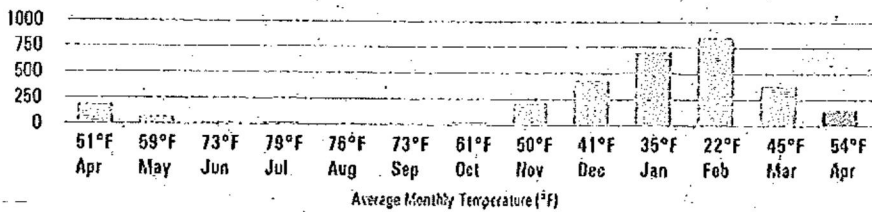


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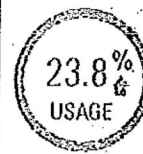
Gas Service Details **April Statement**

Gas Usage in Cubic Feet (CCF)



Gas Usage Summary (CCF)

So far this year, you're using 23.8% more than last year



2020	1,679 CCF
2021	2,078 CCF

Usage from Jan-Apr for 2020 & 2021

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Account Messages

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.

Important Message for Gas Customers - Be Safe!

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Ameren Missouri's Community Solar program enables your home or small business to support renewable energy in Missouri through an easy monthly subscription. Learn more at Amerenmissouri.com/communitysolar.

Education and Work Experience Background of

Lena M. Mantle, P.E.

In my position as Senior Analyst for the Office of the Public Counsel (“OPC”) I provide analytic and engineering support for the OPC in electric, gas, and water cases before the Commission. I have worked for the OPC since August, 2014.

I retired on December 31, 2012 from the Public Service Commission Staff as the Manager of the Energy Unit. As the Manager of the Energy Unit, I oversaw and coordinated the activities of five sections: Engineering Analysis, Electric and Gas Tariffs, Natural Gas Safety, Economic Analysis, and Energy Analysis sections. These sections were responsible for providing Staff positions before the Commission on all of the electric and gas cases filed at the Commission. This included reviews of fuel adjustment clause filings, resource planning compliance, gas safety reports, customer complaint reviews, territorial agreement reviews, electric safety incidents and the class cost-of-service and rate design for natural gas and electric utilities.

Prior to being the Manager of the Energy Unit, I was the Supervisor of the Engineering Analysis Section of the Energy Department from August, 2001 through June, 2005. In this position, I supervised engineers in a wide variety of engineering analysis including electric utility fuel and purchased power expense estimation for rate cases, generation plant construction audits, review of territorial agreements, and resolution of customer complaints all the while remaining the lead Staff conducting weather normalization in electric cases.

From the beginning of my employment with the Commission in the Research and Planning Department in August, 1983 through August, 2001, I worked in many areas of electric utility regulation. Initially I worked on electric utility class cost-of-service analysis, fuel modeling and what has since become known as demand-side management. As a member of the Research and Planning Department under the direct supervision of Dr. Michael Proctor, I participated in the development of a leading-edge methodology for weather normalizing hourly class energy for rate design cases. I took the lead in developing personal computer programming of this methodology and applying this methodology to weather-normalize electric usage in numerous electric rate cases. I was also a member of the team that assisted in the development of the Missouri Public Service Commission electronic filing and information system (“EFIS”).

I received a Bachelor of Science Degree in Industrial Engineering from the University of Missouri, at Columbia, in May, 1983. I am a registered Professional Engineer in the State of Missouri.

Lists of the cases I have filed testimony as an OPC, the Missouri Public Service Commission rules in which I participated in the development of or revision to, and the cases that I provided testimony in follow.

Office of Public Counsel Case Listing

Case	Filing Type	Issue
GR-2021-0108	Direct, Rebuttal, Surrebuttal	Weather Normalization Adjustment mechanism, miscellaneous tariff issues
WR-2020-0240	Direct, Rebuttal, Surrebuttal	Normalized customer usage, revenue stabilization mechanism
EO-2020-0262	Direct	FAC Imprudence
ER-2020-0311	Rebuttal	FAC rate change
ER-2019-0374	Direct, Rebuttal, Surrebuttal	Weather Norm Rider, Fuel Adjustment Clause
ER-2019-0355	Direct, Rebuttal	Fuel Adjustment Clause, Unregulated Competition tariff sheet
EO-2019-0067 & EO-2019-0068	Rebuttal	Prudence of GMO steam auxiliary costs and GMO and KCPL's wind PPAs
EA-2019-0010	Rebuttal, Surrebuttal	Energy Market Prices, Customer Protections
GO-2019-0058 & GO-2019-0059	Direct, Rebuttal	Weather
ER-2018-0145 & ER-2018-0146	Direct, Rebuttal, Surrebuttal	Purchased Power, Customer Bills, Crossroads, Resource Planning
EO-2018-0092	Rebuttal, Surrebuttal	OPC Opposition of Request for Approval of Changes to Resource Plan
WR-2017-0285	Direct, Rebuttal, Surrebuttal	Normalized base usage
GR-2017-0215 & GR-2017-0216	Direct, Rebuttal, Surrebuttal	Energy Efficiency and Low-Income Programs
EO-2017-0065	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause Prudence Review
ER-2016-0285	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2016-0179	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause,
ER-2016-0156	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause, Resource Planning
ER-2016-0023	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
WR-2015-0301	Direct, Rebuttal, Surrebuttal	Revenues, Environmental Cost Recovery Mechanism
ER-2014-0370	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2014-0351	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2014-0258	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
EC-2014-0224	Surrebuttal	Policy, Rate Design

Missouri Public Service Commission Rules

- 20 CSR 4240-3 Filing Requirements for Electric Utilities (various rules)
- 20 CSR 4240-14 Utility Promotional Practices
- 20 CSR 4240-18 Safety Standards
- 20 CSR 4240-20.015 Electric Utility Affiliate Transactions
- 20 CSR 4240-20.017 HVAC Services Affiliate Transactions
- 20 CSR 4240-20.090 Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms
- 20 CSR 4240-20.091 Electric Utility Environmental Cost Recovery Mechanisms
- 20 CSR 4240-22 Electric Utility Resource Planning
- 20 CSR 4240-80.015 Steam Heating Utility Affiliate Transactions
- 20 CSR 4240-80.017 HVAC Services Affiliate Transactions

Missouri Public Service Commission Staff Testimony

Case No.	Filing Type	Issue
ER-2012-0175	Rebuttal, Surrebuttal	Resource Planning Capacity Allocation
ER-2012-0166	Rebuttal, Surrebuttal	Fuel Adjustment Clause
EO-2012-0074	Direct/Rebuttal	Fuel Adjustment Clause Prudence
EO-2011-0390	Rebuttal	Resource Planning Fuel Adjustment Clause
ER-2011-0028	Rebuttal, Surrebuttal	Fuel Adjustment Clause
EU-2012-0027	Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2010-0356	Rebuttal, Surrebuttal	Resource Planning Allocation of Iatan 2
EO-2010-0255	Direct/Rebuttal	
ER-2010-0036	Supplemental Direct, Surrebuttal	Fuel Adjustment Clause
ER-2009-0090	Surrebuttal	Capacity Requirements
ER-2008-0318	Surrebuttal	Fuel Adjustment Clause
ER-2008-0093	Rebuttal, Surrebuttal	Fuel Adjustment Clause Low-Income Program
ER-2007-0004	Direct, Surrebuttal	Resource Planning
GR-2007-0003	Direct	Energy Efficiency Program Cost Recovery
ER-2007-0002	Direct	Demand-Side Program Cost Recovery
ER-2006-0315	Supplemental Direct, Rebuttal	Energy Forecast, Demand-Side Programs Low-Income Programs
ER-2006-0314	Rebuttal	Jurisdictional Allocation Factor
EA-2006-0309	Rebuttal, Surrebuttal	Resource Planning
ER-2005-0436	Direct, Rebuttal, Surrebuttal	Low-Income Programs, Energy Efficiency Programs, Resource Planning
EO-2005-0329	Spontaneous	Demand-Side Programs, Resource Planning
EO-2005-0293	Spontaneous	Demand-Side Programs, Resource Planning
ER-2004-0570	Direct, Rebuttal, Surrebuttal	Reliability Indices, Energy Efficiency Programs Wind Research Program
EF-2003-0465	Rebuttal	Resource Planning
ER-2002-424	Direct	Derivation of Normal Weather
EC-2002-1	Direct, Rebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-2001-672	Direct, Rebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-2001-299	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EM-2000-369	Direct	Load Research
EM-2000-292	Direct	Load Research
EM-97-515	Direct	Normalization of Net System

Case No.	Filing Type	Issue
ER-97-394, et. al.	Direct, Rebuttal, Surrebuttal	Weather Normalization of Class Sales Weather Normalization of Net System Energy Audit Tariff
EO-94-174	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
ER-97-81	Direct	Weather Normalization of Class Sales Weather Normalization of Net System TES Tariff
ER-95-279	Direct	Normalization of Net System
ET-95-209	Rebuttal, Surrebuttal	New Construction Pilot Program
EO-94-199	Direct	Normalization of Net System
ER-94-163	Direct	Normalization of Net System
ER-93-37	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EO-91-74, et. al.	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EO-90-251	Rebuttal	Promotional Practices Variance
ER-90-138	Direct	Weather Normalization of Net System
ER-90-101	Direct, Rebuttal, Surrebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-85-128, et. al.	Direct	Demand-Side Update
ER-84-105	Direct	Demand-Side Update