Exhibit No.:

Issue(s): Expense/Misc. A&G

Expense

-Witness: Po

Paul K. Amenthor

Sponsoring Party:

MoPSC Staff

Type of Exhibit:

Rebuttal Testimony, ER-2019-0335

Case No.: Date Testimony Prepared:

January 21, 2020

MISSOURI PUBLIC SERVICE COMMISSION FINANCIAL AND BUSINESS ANALYSIS DIVISION AUDITING DEPARTMENT

REBUTTAL TESTIMONY
OF

PAUL K. AMENTHOR

UNION ELECTRIC COMPANY, d/b/a AMEREN MISSOURI

CASE NO. ER-2019-0335

Jefferson City, Missouri January 2020

Saff Exhibit No. 08
Date 3 4 20 Reporter Sw8
File No. £2-7019-0335

1		REBUTTAL TESTIMONY		
2	##T	\mathbf{OF}		
3		PAUL K. AMENTHOR		
5	UNION ELECTRIC COMPANY, d/b/a AMEREN MISSOURI			
6		CASE NO. ER-2019-0335		
7	Q.	Please state your name and business address.		
8	A.	Paul K. Amenthor, 111 N. 7 th street, Suite 105, St. Louis, MO 63101.		
9	Q.	By whom are you employed and in what capacity?		
10	A.	I am employed by the Missouri Public Service Commission ("Commission") as		
1 İ	a Utility Regulatory Auditor.			
12	Q.	Are you the same Paul K. Amenthor who contributed to Staff's Revenue		
13	Requirement Cost of Service Report filed on December 4, 2019 in this case?			
14	A.	Yes, I am.		
15	Q.	What is the purpose of your rebuttal testimony in this proceeding?		
16	A.	My rebuttal testimony will respond to the direct testimony of Ameren Missouri		
17	witness Laura	Moore's proposal to increase operating expenses for various MEEIA related		
18	administrative and training costs.			
19	Q.	What is Ameren Missouri's proposal regarding the MEEIA related costs?		
20	A.	On page 25, lines 17-19 of her direct testimony, Ameren Missouri witness Laura		
21	Moore proposes inclusion of approximately \$337,000 in administrative and training costs that			
22	Ameren Missouri sought approval for inclusion in the MEEIA rider mechanism. Staff reviewed			
23	the case filings in the first MEEIA cycle 2 prudence review docket, Case No. EO-2018-0155.			

A.

2

3

On page 14, lines 5 through 7 of the Staff recommendation in that case, Staff concluded that: "Staff believes any out of state traveling and training should be considered an indirect labor cost which should not be recovered in MEEIA".

4

Q. What happened subsequent to the first MEEIA cycle 2 prudence review?

Prior to the filing of this rate case, on November 20, 2018, Ameren Missouri

5

filed a tariff to adjust the rate of its MEEIA Rider "EEIC Rider" Case No. ER-2019-0151, for

6 7

costs during the period ending December 2018 (the end of the twelve month test year period in

8

this rate proceeding). After review, it appears to Staff that a majority of the \$337,492 that has

9

been requested for recovery as part of this rate case was included in the MEEIA rider rate for

10

which the tariff was approved by the Commission and went into effect on January 25, 2019.

11

Staff issued Data Request No. 240.1 to determine if all or a portion of the \$337,492 had already

12

been sought for recovery through the MEEIA rider.

13

Q. What did Ameren Missouri's response to Staff Data Request No. 240.1 contain?

14

A. Ameren Missouri acknowledged that the majority of the \$337,492 proposed for

15

inclusion in the cost of service is being recovered through the MEEIA rider, and a portion is no

16

longer sought for rate recovery, or was incurred outside of the test year established in this case.

17

A minor amount, specifically, certain purchasing rate expenses, remain unrecovered. Below is

18

a breakdown of the cost and associated recovery:

19

Original Proposed Adjustment	\$ 337,492
Additional Costs	\$ (24,046) Mis-recorded (No longer proposed for adjustment by Company)
Customer Segmentation	\$ (96,003) Outside TY
Included in the MEEIA Rider filed in 11/2018	\$ (213,308) Case No. ER-2019-0151
Unrecovered Balance	\$ 4,135 Purchasing Rate Expenses

20

21

Q. What is Staff's position regarding the proposed MEEIA training and customer segmentation cost inclusion?

22

Rebuttal Testimony of Paul K. Amenthor

- A. Staff proposes no adjustment to include the costs as proposed by Ameren Missouri witness Laura Moore, as the majority of the costs eligible for recovery in the test year were already included and are currently being recovered through the MEEIA Rider. The remaining purchasing rate items in the amount of \$4,135 are overhead costs related to the procurement of goods and services. Staff has requested specific detail regarding these purchasing rate items in Staff Data Request No. 240.2 in order to determine if these costs have already been addressed through other Staff annualizations and, if needed, will provide an update on the recommended treatment of these purchasing rate items in surrebuttal testimony.
 - Q. Does this conclude your rebuttal testimony?
 - A. Yes, it does.

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 Decrease Its Revenues for Electric Service) Case No. ER-2019-0335
AFFIDAVIT OF PA	UL K. AMENTHOR
STATE OF MISSOURI)	
ST. LOUIS COUNTY) ss.	
	and on his oath declares that he is of sound minding Rebuttal Testimony of Paul K. Amenthor; and
that the same is true and correct according to his	
Further the Affiant sayeth not. PAR	ul K. Amenthos UL K. AMENTHOR
JUR	RAT
Subscribed and sworn before me, a duly cons	stituted and authorized Notary Public, in and for
St. Louis County, State of Missouri, at my office	in St. Louis, on this 20 day of January,
2020.	
LISA M. FERGUSON Notary Public - Notary Seal State of Missouri Commissioned for St. Louis County My Commission Expires: June 08, 2020 Commission Number: 16631502	Juan Huguson Notary Public