

Exhibit No.:
Issue(s): Expense/Misc. A&G
Expense
Witness: Paul K. Amenthor
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2019-0335
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*

Staff Exhibit No. 108
Date 3/4/20 Reporter JMB
File No. ER-2019-0335

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Paul K. Amenthor

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

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

5 A. Prior to the filing of this rate case, on November 20, 2018, Ameren Missouri
6 filed a tariff to adjust the rate of its MEEIA Rider “EEIC Rider” Case No. ER-2019-0151, for
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
22 segmentation cost inclusion?

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

9 Q. Does this conclude your rebuttal testimony?

10 A. Yes, it does.

