

Exhibit No.:
Issue: Policy
Witness: J Luebbert
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2019-0335
Date Testimony Prepared: December 18, 2019

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

DIRECT TESTIMONY

OF

J LUEBBERT

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. ER-2019-0335

*Jefferson City, Missouri
December 2019*

Staff Exhibit No. 105
Date 3/4/20 Reporter JLB
File No. ER-2019-0335

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DIRECT TESTIMONY
OF
J LUEBBERT
UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

CASE NO. ER-2019-0335

Q. Please state your name and business address.

A. My name is J Luebbert. My business address is 200 Madison Street, Jefferson City, Missouri 65101.

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

A. I am employed by the Missouri Public Service Commission ("Commission") as a Utility Engineering Specialist.

Q. Please describe your educational background and relevant work experience.

A. I received my Bachelor of Science degree in Biological Engineering from the University of Missouri in 2012. I was employed by the Missouri Department of Natural Resources as an Environmental Engineer from 2012 through 2016. I have been employed by the Commission since 2016 as a Utility Engineering Specialist and as Case Manager.

Q. Have you previously testified before the Commission?

A. Yes. My Case Summary is attached to my testimony as Schedule JL-d1.

EXECUTIVE SUMMARY

Q. What is the purpose of this Direct Testimony?

Direct Testimony of
J Luebbert

1 A. The purpose of this Direct Testimony is to sponsor Staff's Report on Class Cost
2 of Service ("CCOS Report"), which includes the recommended rate design developed by Staff
3 and described in the CCOS Report filed concurrently with this direct testimony.

4 Q. Did Staff perform a Class Cost of Service ("CCOS") study in this case?

5 A. Yes it did.

6 **CCOS REPORT**

7 Q. What is Staff's recommendation in this case?

8 A. As more specifically explained in the CCOS Report, Staff's CCOS is designed
9 to determine what rate of return is produced by each customer class on that class's currently
10 tariffed rates, for recovery of any calculated revenue requirement amount. For the reasons that
11 will be discussed in more detail in the CCOS Report, due to the interrelationship of this case
12 with the temporary tax rider and expected Ameren Missouri capital build-out, Staff does not
13 recommend that revenue responsibility be realigned at this time.¹

14 Q. Does Staff recommend any new rate designs in its CCOS Report?

15 A. Yes. Given the fact that Ameren Missouri is beginning to implement Advanced
16 Meter Infrastructure ("AMI"), Staff is recommending that the Commission consider this case
17 as an opportunity to begin Time of Use ("ToU") rate design. Because Ameren Missouri will
18 not complete deployment of AMI meters for some time, and in the interest of using these
19 introductory ToU rates to educate customers about ToU with minimal customer impact, Staff's
20 recommended ToU rate design focuses on minimizing customer impact, and applying a gradual

¹ On December 18th Staff became aware that Ameren Missouri was redoing its load research process for approximately half of its test period apparently prompted by Staff DR 517. As indicated on page 49 of the Staff Cost of Service Report, Staff was concerned that anomalies existed for certain months of data. The December 18th discussion further undermines Staff's confidence in the reliability of this data. Reliable load research data is integral to a reasonable CCoS.

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1 rollout of the rates. In the interest of the gradual rollout of ToU rates, Staff recommends that
2 the Commission require Ameren Missouri to educate its existing customers regarding the
3 impact of ToU rates on their bills prior to implementation of ToU rates by providing a shadow
4 bill that indicates the usage in each time interval. Staff recommends that new customers with
5 AMI meters be placed on a default ToU rate schedule unless they specifically request otherwise.

6 Q. Does Staff recommend any other noteworthy items in its CCOS Report?

7 A. Yes. In addition to the ToU rate design, and as discussed in more detail in the
8 CCOS Report, Staff recommends:

- 9 1) Paperless Billin
- 10 2) Staff recommends revisions to Ameren Missouri's application of
11 "Billing Period."
- 12 3) Staff recommends a number of data retention measures be implemented:
 - 13 a) Implement more thorough record keeping or data accessibility
14 practices to better associate distribution system costs with the
15 voltage of energy distributed;
 - 16 b) Take steps necessary in its AMI deployment process to provide
17 accurate load research data at a high level of precision, by
18 implementing practices to leverage AMI meter data for load
19 research purposes;
 - 20 c) On an ongoing basis, Ameren Missouri should retain interval
21 data for customers with AMI meters be retained for a minimum
22 of a rolling 12 month time period so that customers may
23 compare ToU options;
 - 24 d) Study and retain determinants associated with the creation of a
25 coincident peak demand charge for all classes.
- 26 4) Staff recommends certain tariffs be updated as part of the compliance
27 process in this case consistent with processes identified within those
28 tariffs:
 - 29 a) Update the Facilities Charge on Tariff Sheet 158 (Community
30 Solar Pilot Program) to reflect the changes made to the related
31 energy charges, if applicable;

- 1 b) Update the Renewable Energy Standard Rate Adjustment
2 Mechanism (“RESRAM”) Tariff Sheet No. 93.4 to reflect the
3 RESRAM base amount determined in this case;
- 4 c) Update the MEEIA margin rates used for calculating the
5 throughput disincentive within the MEEIA mechanism.
- 6 5) Staff recommends this case be taken as an opportunity to implement
7 solutions to certain issues that have arisen in other contexts:
- 8 a) Clarify the billing process for ToU customers;
- 9 b) Revenue Treatment for Potential Customer Renewable Energy
10 Credit Program;
- 11 c) Stipulation and Agreement in ET-2018-0132 concerning line
12 extension record retention.
- 13 6) Staff recommends establishment of a ToU rate schedule to be applicable
14 to separately-metered EV charging equipment, on an opt-in basis.²
- 15 7) Staff recommends modifications to the Fuel Adjustment Clause
16 (“FAC”) base factor and transmission percentage.
- 17 Q. Does this conclude your Direct Testimony?
- 18 A. Yes it does.

² At this time, Staff does not object to the general design proposed by Ameren Missouri for this purpose. Final design of this rate is dependent on the revenue requirement established in this matter.

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 J LUEBBERT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW J LUEBBERT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of J Luebbert*; and that the same is true and correct according to his best knowledge and belief.

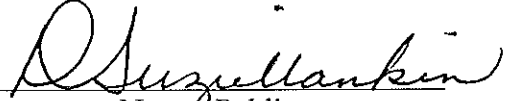
Further the Affiant sayeth not.

J LUEBBERT 

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 18th day of December, 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public

**J Luebbert
Case Summary**

Case Number	Company	Issues
EO-2015-0055	Ameren Missouri	Evaluation, Measurement, and Verification
EO-2016-0223	Empire District Electric Company	Supply-Side Resource Analysis, Transmission and Distribution Analysis, Demand-Side Resource Analysis, Integrated Resource Analysis
EO-2016-0228	Ameren Missouri	Utilization of Generation Capacity, Plant Outages, and Demand Response Program
ER-2016-0179	Ameren Missouri	Heat Rate Testing
ER-2016-0285	Kansas City Power & Light Company	Heat Rate Testing
EO-2017-0065	Empire District Electric Company	Utilization of Generation Capacity and Station Outages
EO-2017-0231	Kansas City Power & Light Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2017-0232	KCP&L Greater Missouri Operations Company	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0038	Ameren Missouri	Supply-Side Resource Analysis, Transmission and Distribution Analysis, Demand-Side Resource Analysis, Integrated Resource Analysis
EO-2018-0067	Ameren Missouri	Utilization of Generation Capacity, Heat Rates, and Plant Outages
EO-2018-0211	Ameren Missouri	Avoided Costs and Demand Response Programs
EA-2019-0010	Empire District Electric Company	Market Protection Provision
EO-2018-0211	Ameren Missouri	Avoided Cost and Demand Response Programs
GO-2019-0115	Spire East	Policy
GO-2019-0116	Spire West	Policy
EO-2019-0132	Kansas City Power & Light Company	Avoided Cost and Demand Response Programs