

FILED
May 02, 2023
Data Center
Missouri Public
Service Commission

Exhibit No. 109

Staff – Exhibit 109
Amanda C. Conner
Direct Testimony (Rate Design)
File No. ER-2022-0337

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

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

**DIRECT TESTIMONY
Class Cost of Service/Rate Design**

OF

AMANDA C. CONNER

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

CASE NO. ER-2022-0337

*Jefferson City, Missouri
January 2023*

**** Denotes Confidential Information ****

1
2
3
4
5
6
7
8
9
10

**TABLE OF CONTENTS OF
DIRECT TESTIMONY OF
AMANDA C. CONNER
UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI
CASE NO. ER-2022-0337**

EXECUTIVE SUMMARY1
REVISED BASE FACTOR2
REVISED TRANSMISSION PERCENTAGE 3
FAC VOLTAGE ADJUSTMENT FACTORS 4

1 **DIRECT TESTIMONY OF**

2 **AMANDA C. CONNER**

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

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

6 Q. Please state your name and business address.

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

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

10 A. I am employed by the Missouri Public Service Commission (“Commission”) as
11 a Utility Regulatory Auditor.

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

13 A. Please refer to the attached Schedule ACC-d1.

14 Q. Have you previously filed testimony before this Commission?

15 A. Yes. Please refer to Schedule ACC-d2 for a list of cases in which I have
16 previously lead or participated.

17 **EXECUTIVE SUMMARY**

18 Q. What are the issues that Staff is providing recommendations for that have an
19 impact on Union Electric Company, d/b/a Ameren Missouri’s (“Ameren Missouri”) respective
20 fuel adjustment clause (“FAC”) and FAC tariff sheets?

21 A. Staff provides the following recommendations for issues that have an impact on
22 Ameren Missouri’s FAC and FAC tariff sheets:

1
2
3
4
5
6
7
8
9
10

**TABLE OF CONTENTS OF
DIRECT TESTIMONY OF
AMANDA C. CONNER
UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI
CASE NO. ER-2022-0337**

EXECUTIVE SUMMARY1
REVISED BASE FACTOR2
REVISED TRANSMISSION PERCENTAGE 3
FAC VOLTAGE ADJUSTMENT FACTORS 4

1 1. Continue Ameren Missouri's FAC with the modifications discussed below:

2 a. Include a new Base Factor ("BF") for a summer rate and winter rate¹
3 for Ameren Missouri in the FAC tariff sheets calculated from the Net
4 Base Energy Cost ("NBEC")² that the Commission includes in the
5 revenue requirement upon which it sets Ameren Missouri's general
6 rates in this case; and

7 b. Clarify that the only transmission costs that are included in Ameren
8 Missouri's FAC are those that Ameren Missouri incurs for purchased
9 power³ and off-system sales ("OSS"), as the current FAC tariff sheets
10 allow for.

11 **REVISED BASE FACTOR**

12 Q. What is Staff recommending for Ameren Missouri's Base Factors?

13 A. Staff calculated the summer and winter BF rate based upon an analysis of
14 data compiled during the 12 months ending June 30, 2022, in Confidential Schedule ACC-d3,
15 which results in: (1) net base energy costs (fuel and purchased power costs less OSS revenue)
16 including Staff's accounting adjustments to test year⁴; and (2) normalized net system
17 inputs (NSI):

18 ■ Summer Base Factor:

19	NBEC	\$193,707,534
20	NSI	<u>\$12,402,356,351</u>
21	BF	\$1.562 per kWh

¹ Summer rates are June through September. Winter rates are October through May.

² Net Base Energy Cost (NBEC) is defined in Ameren Missouri's 1st Revised Sheet No. 72.6 as NBEC ordered by the Commission in the last general rate case for Ameren Missouri and consistent with the costs and revenues included in the calculation of the FPA.

³ Purchased power for native load that is served by power that Ameren Missouri did not generate.

⁴ Similar to Ameren Missouri's calculated NBEC, Staff's net revenue calculation was also normalized to exclude the net revenue of High Prairie and Atchison from the NBEC total.

1		▪ Winter Base Factor:
2	NBEC	\$267,959,764
3	NSI	<u>\$20,138,763,660</u>
4	BF	\$1.331 per kWh

5 Staff will true-up its recommended BF for summer and winter rates in its True-up surrebuttal
6 testimony to be filed on March 13, 2023.

7 **REVISED TRANSMISSION PERCENTAGE**

8 Q. What is the percentage Staff recommends for Ameren Missouri’s transmission
9 costs?

10 A. As provided in Staff witness Shawn E. Lange’s work papers,⁵ Staff calculated
11 the pass-through percentage of Midcontinent Independent System Operator, Inc. (“MISO”)
12 transmission costs⁶ and revenues in the FAC as 8.18%. This calculation is based on the output
13 from Staff’s fuel models that were used to develop the revenue requirements found in Staff’s
14 COS report for this case.

15 Q. Explain why Staff believes these calculations are appropriate.

16 A. The calculations are appropriate because they are consistent with the method
17 used to calculate the pass-through percentage of MISO transmission costs and revenues for
18 Ameren Missouri’s current FAC.

⁵ Work paper titled “SummarywithsalesDirect337 11823 MP cor.xlsb.”

⁶ The pass-through percentage of MISO transmission costs are a representation of transmission expenses that are associated with energy purchases from the MISO IM in excess of energy generation by Ameren Missouri’s generation units.

1 **FAC VOLTAGE ADJUSTMENT FACTORS**

2 Q. What is Staff recommending as the FAC Voltage Adjustment Factors at this
3 time?

4 A. Staff witness Alan J. Bax continues to use the voltage adjustment factors
5 presently included in the FAC tariff sheets for Ameren Missouri's most recent general rate case
6 in the current general rate case as provided in the following table.

7

Voltage Level	Voltage Adjustment Factor
Secondary	1.0567
Primary	1.0248
High Voltage	1.0085
Transmission	0.9954

8

9 These voltage adjustment factors adjust for the energy losses experienced in the delivery of
10 electricity from the generator to customers, which includes secondary, primary, high voltage,
11 and transmission voltage levels. These factors will be utilized in Staff's determination of a Fuel
12 Adjustment Rate ("FAR") for each voltage service classification.

13 Q. Does this conclude your testimony?

14 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 Adjust)
Its Revenues for Electric Service) Case No. ER-2022-0337

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 *Direct Testimony of Amanda C. Conner*; and that the same is true and correct according to her best knowledge and belief.

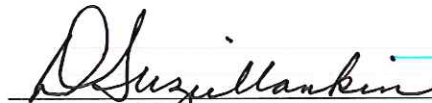
Further the Affiant sayeth not.


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 20th day of January 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

Educational Background and Work Experience of Amanda C. Conner

My educational background includes a Bachelor of Science degree in Accounting/Finance from Columbia College in Columbia, Missouri where I graduated in May of 2012.

In February 2016, I started a new career as a Utility Regulatory Auditor I with the Missouri Office of Public Counsel, where I worked for five years providing support and testimony for several rate cases before accepting my position as Regulatory Auditor with the Energy Resources Department of the Missouri Public Service Commission. Since that point, my experience includes Fuel Adjustment Clause Prudence Reviews, Missouri Energy Efficiency Investment Act Prudence Reviews, and Fuel Adjustment Rate filings.

My prior work experience includes eight years with the Missouri Department of Revenue first in the Taxation Division, and then in the General Counsel's Office where I handled taxation issues regarding Bankruptcy.

CASE PROCEEDING PARTICIPATION
AMANDA C. CONNER, UTILITY REGULATORY AUDITOR

OPC PARTICIPATION		ISSUE	TESTIMONY TYPE	LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EMPIRE	ER-2016-0023	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2016-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LACLEDE GAS COMPANY	GR-2017-0215	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MGE	GR-2017-0216	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MAWC	WR-2017-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LIBERTY	GR-2018-0013	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
GMO	ER-2018-0146	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2018-0145	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
EMPIRE	ER-2019-0374	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
SPIRE	GR-2021-0108	GENERAL RATE CASE	DIRECT		
EMPIRE	ER-2021-0097	FAR FILING-9th REVISED (24th AP)	STAFF REPORT		
EMPIRE	ER-2022-0095	FAR FILING-11TH REVISED (26th AP)	STAFF REPORT		
PSC PARTICIPATION		ISSUE		LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EVERGY MO METRO (prior KCPL)	EO-2021-0417	MEEIA PRUDENCE REVIEW (3rd)	STAFF REPORT, DIRECT		
EVERGY MO METRO (prior KCPL)	ER-2022-0129	GENERAL RATE CASE	COS Direct		
EVERGY MO WEST (prior GMO)	ER-2022-0130	GENERAL RATE CASE	COS Direct		
EMPIRE	EO-2023-0087	FAC PRUDENCE REVIEW	STAFF REPORT		**
AMEREN MISSOURI	ER-2022-0337	GENERAL RATE CASE	COS Direct, CCOS DIRECT, REBUTTAL, SURREBUTTAL/TRUE-UP DIR	*	**

Status: * In Hearing
 ** In Process (working on case)

Case No. ER-2022-0337
Schedule ACC-d2

SCHEDULE ACC-d3

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY