

Exhibit No. 164

Exhibit No.:
Issue(s): *Market Prices*
Witness: *Justin Tevie*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2022-0337*
Date Testimony Prepared: *February 15, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

JUSTIN TEVIE

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

CASE NO. ER-2022-0337

Jefferson City, Missouri
February 2023

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JUSTIN TEVIE**

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

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

7 Q. Please state your name and business address.

8 A. My name is Justin Tevie, and my business address is Missouri Public Service
9 Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

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

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 an Economics Analyst in the Tariff/Rate Design Department in the Industry Analysis Division
13 of the Commission’s Staff.

14 Q. Are you the same Justin Tevie that filed direct testimony in this case?

15 A. Yes.

16 Q. What is the purpose of your rebuttal testimony?

17 A. I will discuss the nature of the error in Staff’s underlying work paper relating to
18 market prices.

19 Q. Please describe the nature of the error in the underlying work paper provided to
20 Staff witness Shawn E. Lange PE?

21 A. A formula calculating the production-weighted average price was not updated
22 from October 1, 2021, to June 30, 2022. As such, the average prices provided to Mr. Lange for
23 use in the fuel-cost model were inaccurate. Furthermore, Staff inadvertently included the
24 year 2021 in order to calculate the three-year average, 2020-2022, for February.

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1 Q. Please explain how this error was rectified?

2 A. The error was corrected by simply updating the production-weighted
3 average formula for the affected period -- October 1, 2021, through June 30, 2022. In order
4 to approximate normal conditions for the month of February in the year 2021, Staff altered
5 its method for this month by calculating a two-year average price, due to the high market
6 prices experienced in February of 2021 as a result of Winter storm Uri, using 2020 and
7 2022 data.

8 Q. What is the impact of the updated production-weighted average prices on the
9 fuel model?

10 A. It is expected to increase Ameren's variable fuel expense by approximately
11 \$105,526,511 and hence the revenue requirement.

12 Q. Does this conclude your rebuttal testimony?

13 A. Yes.

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 JUSTIN TEVIE

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW JUSTIN TEVIE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Justin Tevie*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



JUSTIN TEVIE

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 10th day of February 2023.



Notary Public

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070