

Exhibit No.:
Issue(s): Policy
Witness: Natelle Dietrich
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: GR-2019-0077
Date Testimony Prepared: May 3, 2019

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

Staff Exhibit No. 107
Date 8-15-19 Reporter COY
File No. GR-2019-0077

DIRECT TESTIMONY

OF

NATELLE DIETRICH

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

CASE NO. GR-2019-0077

*Jefferson City, Missouri
May 2019*



1 **CCOS REPORT**

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

3 A. As more specifically explained in the CCOS Report, relative to the class
4 revenues generated *prior to the interim rate reduction*, Staff recommends that any decrease in
5 permanent rates be allocated to the classes as follows:

- 6 1. Maintain the revenue responsibility of the Residential, General Service, and
7 Interruptible classes under permanent rates¹;
- 8 2. Apply the first \$286,820 of decrease equally to the Standard Transportation
9 and Large Volume Transportation Classes;
- 10 3. Apply any further decreases to the Standard Transportation class, up to a total
11 reduction to that class of \$547,752;
- 12 4. Apply any further decreases to all classes as an equal percentage adjustment.

13 In Staff's opinion, these changes would minimize customer impact; would retain the class
14 revenue responsibilities of the Residential, General Service and Interruptible classes that existed
15 prior to the interim rate reduction; would maintain the revenue responsibility of the Large
16 Volume Transportation class as it exists on interim rates; and, would move the permanent rates
17 of the Transportation classes closer to Staff's CCOS.

18 Further, Staff provides rate design recommendations for each class, including a
19 residential customer charge of \$17.00 and a residential volumetric rate for all Ccfs of
20 approximately \$.28/Ccf.

21 Q. Does Staff address other noteworthy items in its CCOS Report?

22 A. Yes. In its filing, Union Electric Company d/b/a Ameren Missouri ("Ameren
23 Missouri") is requesting a Weather and Conservation Adjustment Rider ("WCAR"). If the

¹ Rates in effect prior to the interim rate reduction.

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1 Commission determines that a mechanism to account for changes in usage due to variations in
2 weather or conservation is in the public interest and is just and reasonable for Ameren Missouri,
3 Staff witness Michael L. Stahlman recommends a Weather Normalization Adjustment Rider
4 (“WNAR”) similar to the example tariff sheets attached as Appendix 2, Schedule MLS-d1 to
5 the CCOS Report. Regarding the existing Special Contract Rates – Transportation Service
6 (“SCR”), Staff recommends increasing the specificity of provisions contained in Ameren
7 Missouri’s SCR tariff found at Sheet No. 18.1. Staff’s recommended language is provided in
8 Appendix 2, Schedule RK-d1.

9 In addition, and consistent with Commission guidance in previous cases, Staff
10 witnesses Sarah L.K. Lange, Robin Kliethermes and Kim Cox prepared an inclining block
11 Residential rate design for Commission consideration. The inclining block rate alternative is
12 more fully explained in the CCOS Report.

13 Q. Does this conclude your Direct Testimony?

14 A. Yes it does.

