

Exhibit No. 409

Exhibit No.:

409

Issue(s):

Fuel Adjustment Clause (FAC)/

Customer Bills

Witness/Type of Exhibit:

Mantle/Direct

Sponsoring Party:

Public Counsel

Case No.:

ER-2021-0240

DIRECT TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

FILE NO. ER-2021-0240

September 3, 2021

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DIRECT TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

FILE NO. ER-2021-0240

1 **INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson
4 City, Missouri 65102.

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

6 A. I am employed by the Missouri Office of the Public Counsel ("OPC") as a Senior
7 Analyst.

8 **Q. On whose behalf are you testifying?**

9 A. I am testifying on behalf of the OPC.

10 **Q. Please describe your experience and your qualifications.**

11 A. I was employed by the OPC in my current position as Senior Analyst in August 2014.
12 In this position, I have provided expert testimony in electric, gas, and water cases
13 before the Commission on behalf of the OPC. I am a Registered Professional
14 Engineer in the State of Missouri.

15 Prior to my employment by the OPC, I worked for the Staff of the Missouri
16 Public Service Commission ("Staff") from August 1983 until I retired as Manager of
17 the Energy Unit in December 2012. During the time of my employment at the
18 Missouri Public Service Commission ("Commission"), I worked as an Economist,
19 Engineer, Engineering Supervisor, and Manager of the Energy Unit. I was
20 instrumental in the development and application of the Commission's FAC rules and
21 the FAC's of the electric utilities in Missouri after the Missouri Legislature passed

1 Section 366.266 RSMo in 2005, enabling the electric utilities to request a fuel
2 adjustment clause ("FAC").

3 Attached as Schedule LM-D-3 is a brief summary of my experience with
4 OPC and Staff and a list of the Commission cases in which I filed testimony,
5 Commission rulemakings in which I participated, and Commission reports in rate
6 cases to which I contributed as Staff.

7 **Q. What is the purpose of your direct testimony?**

8 A. In this testimony I recommend changes to the bills of customers that receive both
9 natural gas and electric service from Union Electric Company d/b/a Ameren Missouri
10 ("Ameren Missouri") so the customers will be able to easily identify the cost of the
11 electric service separate from the cost of natural gas.

12 I also provide recommended modifications to Ameren Missouri's FAC that
13 are intended to clarify some issues based on circumstances and FAC filings¹ that
14 have been made since Ameren Missouri's last general rate case.

15 **Q. Would you provide a summary of the modification to Ameren Missouri's FAC**
16 **that you are recommending in this case?**

17 A. I am recommending Ameren Missouri's FAC be modified as follows:

- 18 1. Include steps to be taken to mitigate the impact of extraordinary changes in
19 net fuel and purchase power costs;
- 20 2. Not include the final adjustment to coal fuel inventory of a plant that has
21 ceased generation to flow through the FAC; and
- 22 3. Require removal of fuel and purchased power costs for Ameren Missouri
23 research and development projects.

¹ These issues have arisen not just in Ameren Missouri's FAC filings but also in FAC filings of other Missouri electric utilities.

1 | **Q. If the Commission orders these modifications, would they only apply to Ameren**
2 | **Missouri?**

3 | **A. Yes. Because the enabling statute only allows modification to FACs in general rate**
4 | **increase cases, Commission ordered modifications would apply only to Ameren**
5 | **Missouri until similar modifications can be made to the FACs of the other electric**
6 | **utilities in Missouri.**

7 | **Customer Bills**

8 | **Q. What are you recommending the Commission order with regard to customer**
9 | **bills?**

10 | **A. I recommend the Commission order, for the monthly bills of Ameren Missouri electric**
11 | **customers that are also Ameren Missouri gas customers, Ameren Missouri clearly and**
12 | **distinctly state which charges are associated with electric service and which charges**
13 | **are associated with gas service along with a total cost of electric service and total cost**
14 | **of gas service. I have attached recent bills of residential and a small general service**
15 | **electric and natural gas customer to this testimony as Schedules LMM-D-1 and**
16 | **LMM-D-2 to show the myriad of charges on customers' bills and the illogical**
17 | **presentation of the charges. The "Current Charge Detail" of the small general service**
18 | **bill is shown below.**

Current Charge Detail for Statement 04/21/2024

Base Energy Chg-Small General 3 Phase	\$271.09
Seasonal Energy Chg-Small General 3 Phase	\$0.00
Gas Energy Charge - General Service	\$43.89
Electric Customer Charge - Small General 3 Phase	\$19.99
Gas Customer Charge - General Service	\$28.44
Renewable Energy Adjustment	\$0.59
Fuel Adjustment Charge	\$0.90
Purchase Gas Adjustment (PGA)	\$62.10
Delivery Charge Adjustment	\$0.52
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$20.22
Jeff City-Cole Co Municipal Charge	\$28.58
Amount Due	\$476.32

1
2
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5

Q. Which of these charges are for electric service and which are for gas service?

A. The table below shows which charges are electric service charges and which are natural gas service charges.

	<u>Electric</u>	<u>Gas</u>
Base Energy Chg – Small General 3 Phase	X	
Seasonal Energy Chg – Small General 3 Phase	X	
Gas Energy Charge – General Service		X
Electric Customer Charge – Small General 3 Phase	X	
Gas Customer Charge – General Service		X
Renewable Energy Adjustment	X	
Fuel Adjustment Charge	X	
Purchase Gas Adjustment (PGA)		X
Delivery Charge Adjustment		X
Infrastructure Replacement Surcharge		X
Energy Efficiency Investment Charge	X	

6
7
8

Q. Is the total charge associated with electric service shown on the customer's bill?

A. I could not find it on the residential or small general service bill.

1 **Q. Is the total charge associated with natural gas service shown on the customer's**
2 **bill?**

3 A. I could not find it on the residential or small general service bill.

4 **Q. Why is it important for customers to easily be able to find how much of their**
5 **Ameren Missouri monthly bill is for electric and how much is for natural gas?**

6 A. Bills provide price signals to customers. When charges for different services are
7 disaggregated and intermingled, price signals and responses to actions and
8 inactions are indistinguishable to customers. Without a separate total for electric
9 and gas separately disclosed on customers' bills, customers cannot tell how much
10 they are saving on their electric service from getting rid of their second refrigerator
11 or from their natural gas service from replacing their old natural gas storage water
12 heater with a demand water heater.

13 Therefore, I recommend the Commission require Ameren Missouri to
14 distinguish on the bills of its electric and natural gas customers, which charges are
15 for electric service, which charges are for natural gas service, and the total bill for
16 electric service separate from natural gas service.

17 **Q. You have attached to this testimony a residential bill and a small general**
18 **service bill. Is your recommendation that the electric and gas service costs be**
19 **shown only on residential and small general service customer bills?**

20 A. No. While larger customers have the ability to calculate their electric service cost
21 separately from their natural gas cost, it does not mean that they should have to do
22 so to know the cost of the service provided. The cost of every customer's electric
23 service should be easily identifiable separately from their gas service on their bill
24 and not require customers to do additional calculations.

1 Modification to the FAC for Treatment of Extreme Costs

2 **Q. The first modification that you are recommending is that Ameren Missouri's**
3 **FAC be modified to include how extraordinary cost increases in net fuel and**
4 **purchase power costs be treated. Why are you recommending the FAC be**
5 **modified to accommodate extreme cost changes?**

6 **A.** The extended freeze in mid-February 2021 resulted in increases in fuel, purchased
7 power and market revenues that, if passed through the FACs of two Missouri
8 electric utilities, would have had a tremendous impact on their customers' ability
9 to pay their electric bills. The restriction by statute that FACs can only be changed
10 in rate cases limited the remedies available in this situation. Even so, the utilities
11 are looking at different ways to recover their winter storm costs. The utilities' FACs
12 should be modified to provide clarity to the companies, their customers, and the
13 Commission for how this type of sudden, sharp change in costs will be handled in
14 a manner that is affordable to customers while still allowing the utilities cost
15 recovery with an opportunity for the Commission to review the prudence of those
16 extraordinary costs.

17 **Q. How should the FAC be modified?**

18 **A.** While it is obvious that modifications should be made to the FACs for such
19 occurrences, the exact modifications are not quite so obvious. It is logical that what
20 constitutes an extreme impact on net FAC costs should be clarified. However,
21 determining how to do that is not as obvious. Should an extreme cost impact be
22 based on the impact to customers' bills? Should it be based on change in fuel and
23 purchased power costs? If so, should it be based on a change in cost for a month,
24 an accumulation period, or some other period of time? There are other potential
25 ways to determine whether or not a change in fuel costs is extreme enough for
26 special treatment and none is an obvious choice.

27 What is the "special treatment" of extreme costs? The FAC could be
28 modified to allow the recovery of prudent costs be collected over more than one

1 recovery period. But then how many cost recovery periods should a cost be
2 recoverable over before costs are shifted to be securitized or placed in a regulatory
3 asset account for treatment in the next rate case? What is the interest rate that
4 should be used? Should the utility be allowed to recover more than 95% of the
5 costs permitted under the FAC?

6 Another question is how do other Missouri statutes and requirements play
7 into this? How is cost recovery affected by PISA? Is the recovery amount limited
8 by PISA?

9 Again, the need is obvious; the solution is not. Stakeholders should work
10 together to establish modifications to Ameren Missouri's, Evergy's and Liberty's
11 FACs that would clarify for all stakeholders the process if another sharp, sudden
12 cost increase hits the costs and revenues that flow through it. FACs shield the
13 utilities from the impact of sudden, unexpected changes in fuel and purchased
14 power costs, and revenues. They also should be designed in a manner that shields
15 the customers from those same sudden, unexpected changes in fuel and purchased
16 power costs, and revenues.

17 **Modification to the FAC Regarding Coal Inventory Adjustments**

18 **Q. The next modification to the FAC that you are recommending is that the final**
19 **adjustment to coal fuel inventory of a plant that has ceased generation not be**
20 **included as a FAC cost. Why is this modification necessary?**

21 **A.** When a plant is no longer operating, a final accounting adjustment is made to
22 expense the fuel that has become part of the basemat of the coal pile.² This is the
23 cost of coal that, over time, has become unburnable. The FAC includes fuel costs
24 associated with Ameren Missouri's generating plant arising from steam plant

² According to the FERC USoA when coal is purchased, the cost is recorded in an asset account 151 Fuel Stock which is the book cost of fuel on hand. The cost is cleared to account 501 when it is used to generate electricity. In the case of a newly retired coal plant, the cost remaining in account 151 is cleared to another account, such as account 182.3, for consideration in the next general rate case.

1 operations³ and the Federal Energy Regulatory Commission (“FERC”) uniform
2 system accounts provides that account 501 is to account for “fuel used in the
3 production of steam for the generation of electricity”, i.e. fuel burned to produce
4 energy. Because this final inventory adjustment is for fuel that cannot be burned,
5 it cannot be used to produce steam to generate electricity and the cost of the basemat
6 fuel should not flow through the FAC.

7 **Q. Why is this a concern?**

8 A. Two other investor-owned utilities have included in their FACs final “coal
9 inventory adjustments” for basemat coal of generation plants at retirement only to
10 have these costs removed from the FAC. Modifying the FAC to specifically state
11 the cost of basemat coal is not an FAC cost will prevent this from happening when
12 Ameren Missouri retires coal plants.

13 **Q. Does this mean that Ameren Missouri cannot recover the cost of basemat coal?**

14 A. No. Ameren Missouri can still request recovery of basemat coal as a retirement
15 cost, but not as a FAC cost.

16 **Modification to FAC for Research and Development Projects**

17 **Q. The third modification you are recommending is that the cost of energy
18 consumed by research and development projects not be included in the FAC.
19 Why are you making this recommendation?**

20 A. At the time that this testimony is being written, there is a FAC rate change case,
21 ER-2022-0026, where this is an issue. It is Ameren Missouri’s position that the
22 FAC prohibits it from removing the energy costs of its bitcoin mining research
23 project from the FAC.⁴ It is yet to be determined how this will be resolved, but this

³ Current tariff sheet 71.1, 1st Revised, Mo.P.S.C. Schedule 6 and proposed tariff sheet 71.17, Original, Mo.P.S.C. Schedule 6 attached to the direct testimony of Ameren Missouri witness Andrew M. Meyer as Schedule AMM-D3.

⁴ EU-2022-0030, *Verified Application of Union Electric Company d/b/a Ameren Missouri for Deferral Authority*, paragraph 6.

1 rate case provides an opportunity to modify Ameren Missouri's FAC to expressly
2 prohibit the cost of such a project from the FAC.

3 **Q. What is your opinion regarding research and development projects such as**
4 **bitcoin mining?**

5 A. It is my opinion that no cost related to Ameren Missouri's cryptocurrency endeavor,
6 or any endeavor beyond the scope of electric utility regulation, be included in rate
7 base and/or funded with ratepayer backing, including the electricity consumed. If
8 Ameren Missouri wants to enter into speculative commodities, like virtual
9 currencies, then it should do so as a non-regulated service where ratepayers are
10 unexposed to the risks associated with them. OPC witness Dr. Geoff Marke
11 provides additional testimony regarding OPC's position in his direct testimony in
12 this case.

13 Therefore, I recommend that the FAC explicitly require the removal of the
14 energy costs for research and development projects from the Actual Net Energy
15 Costs of the FAC.

16 **Q. Does this conclude your direct testimony?**

17 A. Yes.



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Current Charge Detail for Statement 07/08/2021

Summer Electric Energy Charge - Residential	\$154.59
Winter Elec Energy Chg 0-760 kWh-Residential	\$0.00
Gas Energy Charge - Residential	\$0.00
Electric Customer Charge - Residential	\$9.06
Gas Customer Charge - Residential	\$15.00
Renewable Energy Adjustment	\$0.22
Fuel Adjustment Charge	\$4.03
Purchase Gas Adjustment (PGA)	\$0.00
Delivery Charge Adjustment	\$0.00
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$6.96
Missouri Local Sales Tax	\$1.90
Joff City-Colo Co Municipal Charge	\$12.12
Credit	-\$4.17
Amount Due	\$199.71

AMOUNT DUE \$199.71

Due Date: 07/29/2021

Account Number _____
 Customer Name _____
 Service Address _____

Previous Statement \$0.00
 P-PGA \$0.46020000 per CCF



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Electric Service from 06/06/2021 - 07/08/2021 30 Days

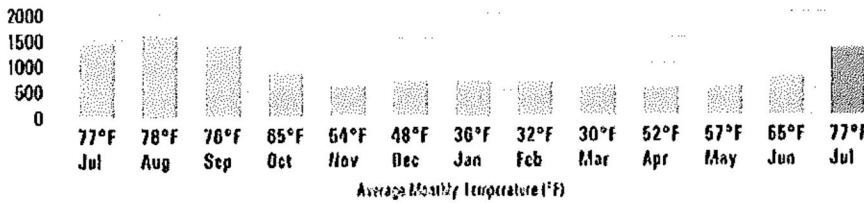
Gas Service from 06/08/2021 - 07/08/2021 30 Days

Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
027507	027507	026188	1309 kWh	Actual
005001	005001	005001	0 CCF	Actual

Electric Service Details

July Statement

Electric Usage in Kilowatt Hours (kWh)



Electric Usage Summary (kWh)

So far this year, you're using 4.4% less than last year



2020	5,392 kWh
2021	5,156 kWh

Usage from July 24 for 2020 & 2021



58860 13073
 01152 6574485 001153 002035 00010001
 INTERNAL USE ONLY

>> See reverse for messages

Page 1 of 1

Please return this portion with your payment.



Check if you have address changes on back.

AMOUNT DUE	Due Date
\$199.71	July 29, 2021
Delinquent Amount After Due Date	Account Number
\$202.89	_____
Amount Enclosed: \$	_____

AMEREN MISSOURI
 PO BOX 88068
 CHICAGO IL 60680-1068



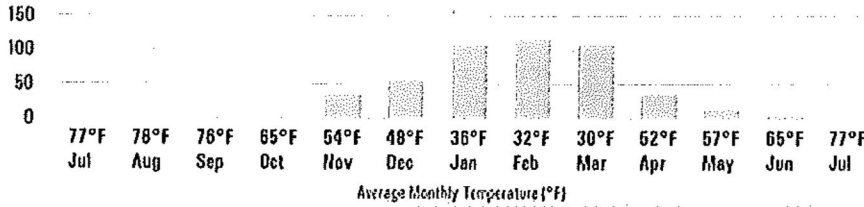
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Gas Service Details

July Statement

Gas Usage in Cubic Feet (CCF)



Gas Usage Summary (CCF)

So far this year, you're using 12.8% less than last year



2020	438 CCF
2021	382 CCF

Usage from Jan-Jul for 2020 & 2021

Summer Is Here. Can Your AC Keep Up?

Right now, you can get up to \$900 cash back when you upgrade to a new energy-efficient HVAC system. If your unit is 10 years old or older, consider upgrading now before it's too late.

To get the details and find a participating contractor, scan the QR code or visit:

AmerenMissouriSavings.com/Summer

Offer applies only to qualifying purchases



Account Messages

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.

Important Message for Gas Customers - Be Safe!

If you ever smell gas, leave the area and call Ameren Missouri at 1.800.552.7583 to investigate the problem. Before you dig, call 1.800.DIG.RITE to locate underground gas pipelines for you.



SPEEDPAY offers customers convenient payment options. You can pay your bill using MasterCard, VISA or American Express 24/7 - just call 1.866.268.3729. For recurring payments visit us at AmerenMissouri.com.

Auto Pay Makes Paying Bills Easier. To enroll, go to AmerenMissouri.com or call 1.800.552.7583 to request an enrollment form.

You're in control with Budget Billing. Your energy payments will be predictable. Avoid surprises and gain peace of mind. Enroll in Budget Billing by sending only \$149.00. Payment must be received by the 'Due Date' on this bill.

Address Changes or Corrections

Name _____
 Address _____
 City, State, Zip _____
 Phone Number _____

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- ONLINE CREDIT CARD
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- ☑ Pay online or manage your account: AmerenMissouri.com
- ☑ Customer Service: 1.877.426.3736

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Current Charge Detail for Statement 04/12/2021

Base Energy Chg-Small General 3 Phase	\$271.09
Seasonal Energy Chg-Small General 3 Phase	\$0.00
Gas Energy Charge - General Service	\$43.89
Electric Customer Charge - Small General 3 Phase	\$19.99
Gas Customer Charge - General Service	\$28.44
Renewable Energy Adjustment	\$0.59
Fuel Adjustment Charge	\$0.90
Purchase Gas Adjustment (PGA)	\$62.10
Delivery Charge Adjustment	\$0.52
Infrastructure Replacement Surcharge	\$0.00
Energy Efficiency Investment Charge	\$20.22
Jeff City-Cole Co Municipal Charge	\$28.58
Amount Due	\$476.32

AMOUNT DUE \$476.32

Due Date: 05/12/2021

Account Number _____

Customer Name _____

Service Address _____

Previous Statement \$673.63

Last Payment - 04/05/2021 \$673.63

P-PGA \$0.43126855 per CCF

Electric Service from 03/21/2021 - 04/19/2021 20 Days

Gas Service from 03/21/2021 - 04/19/2021 20 Days

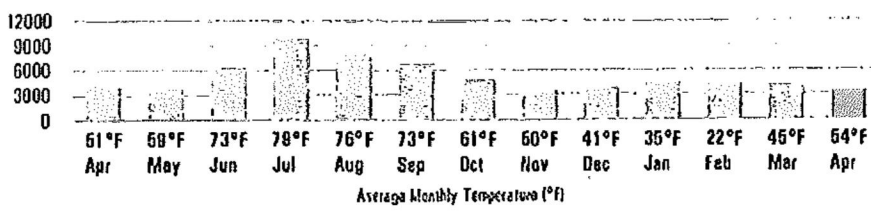
Meter Number	Current Reading	Previous Reading	Current Usage	Reading Type
_____	007331	007302	3480 kWh	Actual
_____	002375	002231	144 CCF	Actual



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Electric Service Details April Statement

Electric Usage in Kilowatt Hours (kWh)



Electric Usage Summary (kWh)

So far this year, you're using 21.5% less than last year



2020 20,810 kWh

2021 16,200 kWh

Usage from Jan-Apr for 2020 & 2021

18482-41483 13073
 X3005 6553185 0035306 006611 00010001
 RTEDMAN HCC 04/17



Keeping You Informed.

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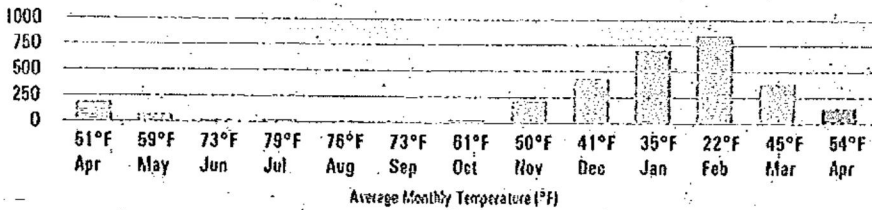


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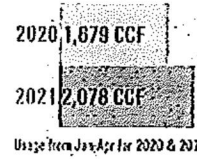
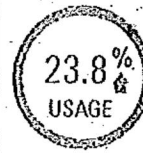
Gas Service Details **April Statement**

Gas Usage in Cubic Feet (CCF)



Gas Usage Summary (CCF)

So far this year, you're using 23.8% more than last year



Giving Business Customers the Power to Save

From your facility's lighting and building controls, to ventilation, cooling systems and more, Ameren Missouri BizSavers[®] program offers energy saving incentives on virtually any qualifying cost-effective energy efficiency project.

Visit AmerenMissouri.com/BizSavings to get started.

Account Messages
A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the due date.

Important Message for Gas Customers - Be Safe!
If you ever smell gas, leave the area and call Ameren Missouri at 1.800.552.7583 to investigate the problem. Before you dig, call 1.800.DIG.RITE to locate underground gas pipelines for you.

Auto Pay Makes Paying Bills Easier. To enroll, go to AmerenMissouri.com or call 1.800.552.7583 to request an enrollment form.

Ameren Missouri's Community Solar program enables your home or small business to support renewable energy in Missouri through an easy monthly subscription. Learn more at Amerenmissouri.com/communitysolar.



Education and Work Experience Background of

Lena M. Mantle, P.E.

In my position as Senior Analyst for the Office of the Public Counsel (“OPC”) I provide analytic and engineering support for the OPC in electric, gas, and water cases before the Commission. I have worked for the OPC since August, 2014.

I retired on December 31, 2012 from the Public Service Commission Staff as the Manager of the Energy Unit. As the Manager of the Energy Unit, I oversaw and coordinated the activities of five sections: Engineering Analysis, Electric and Gas Tariffs, Natural Gas Safety, Economic Analysis, and Energy Analysis sections. These sections were responsible for providing Staff positions before the Commission on all of the electric and gas cases filed at the Commission. This included reviews of fuel adjustment clause filings, resource planning compliance, gas safety reports, customer complaint reviews, territorial agreement reviews, electric safety incidents and the class cost-of-service and rate design for natural gas and electric utilities.

Prior to being the Manager of the Energy Unit, I was the Supervisor of the Engineering Analysis Section of the Energy Department from August, 2001 through June, 2005. In this position, I supervised engineers in a wide variety of engineering analysis including electric utility fuel and purchased power expense estimation for rate cases, generation plant construction audits, review of territorial agreements, and resolution of customer complaints all the while remaining the lead Staff conducting weather normalization in electric cases.

From the beginning of my employment with the Commission in the Research and Planning Department in August, 1983 through August, 2001, I worked in many areas of electric utility regulation. Initially I worked on electric utility class cost-of-service analysis, fuel modeling and what has since become known as demand-side management. As a member of the Research and Planning Department under the direct supervision of Dr. Michael Proctor, I participated in the development of a leading-edge methodology for weather normalizing hourly class energy for rate design cases. I took the lead in developing personal computer programming of this methodology and applying this methodology to weather-normalize electric usage in numerous electric rate cases. I was also a member of the team that assisted in the development of the Missouri Public Service Commission electronic filing and information system (“EFIS”).

I received a Bachelor of Science Degree in Industrial Engineering from the University of Missouri, at Columbia, in May, 1983. I am a registered Professional Engineer in the State of Missouri.

Lists of the cases I have filed testimony as an OPC, the Missouri Public Service Commission rules in which I participated in the development of or revision to, and the cases that I provided testimony in follow.

Office of Public Counsel Case Listing

Case	Filing Type	Issue
GR-2021-0108	Direct, Rebuttal, Surrebuttal	Weather Normalization Adjustment mechanism, miscellaneous tariff issues
WR-2020-0240	Direct, Rebuttal, Surrebuttal	Normalized customer usage, revenue stabilization mechanism
EO-2020-0262	Direct	FAC Imprudence
ER-2020-0311	Rebuttal	FAC rate change
ER-2019-0374	Direct, Rebuttal, Surrebuttal	Weather Norm Rider, Fuel Adjustment Clause
ER-2019-0355	Direct, Rebuttal	Fuel Adjustment Clause, Unregulated Competition tariff sheet
EO-2019-0067 & EO-2019-0068	Rebuttal	Prudence of GMO steam auxiliary costs and GMO and KCPL's wind PPAs
EA-2019-0010	Rebuttal, Surrebuttal	Energy Market Prices, Customer Protections
GO-2019-0058 & GO-2019-0059	Direct, Rebuttal	Weather
ER-2018-0145 & ER-2018-0146	Direct, Rebuttal, Surrebuttal	Purchased Power, Customer Bills, Crossroads, Resource Planning
EO-2018-0092	Rebuttal, Surrebuttal	OPC Opposition of Request for Approval of Changes to Resource Plan
WR-2017-0285	Direct, Rebuttal, Surrebuttal	Normalized base usage
GR-2017-0215 & GR-2017-0216	Direct, Rebuttal, Surrebuttal	Energy Efficiency and Low-Income Programs
EO-2017-0065	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause Prudence Review
ER-2016-0285	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2016-0179	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause,
ER-2016-0156	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause, Resource Planning
ER-2016-0023	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
WR-2015-0301	Direct, Rebuttal, Surrebuttal	Revenues, Environmental Cost Recovery Mechanism
ER-2014-0370	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2014-0351	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2014-0258	Direct, Rebuttal, Surrebuttal	Fuel Adjustment Clause
EC-2014-0224	Surrebuttal	Policy, Rate Design

Missouri Public Service Commission Rules

- 20 CSR 4240-3 Filing Requirements for Electric Utilities (various rules)
- 20 CSR 4240-14 Utility Promotional Practices
- 20 CSR 4240-18 Safety Standards
- 20 CSR 4240-20.015 Electric Utility Affiliate Transactions
- 20 CSR 4240-20.017 HVAC Services Affiliate Transactions
- 20 CSR 4240-20.090 Electric Utility Fuel and Purchased Power Cost Recovery Mechanisms
- 20 CSR 4240-20.091 Electric Utility Environmental Cost Recovery Mechanisms
- 20 CSR 4240-22 Electric Utility Resource Planning
- 20 CSR 4240-80.015 Steam Heating Utility Affiliate Transactions
- 20 CSR 4240-80.017 HVAC Services Affiliate Transactions

Missouri Public Service Commission Staff Testimony

Case No.	Filing Type	Issue
ER-2012-0175	Rebuttal, Surrebuttal	Resource Planning Capacity Allocation
ER-2012-0166	Rebuttal, Surrebuttal	Fuel Adjustment Clause
EO-2012-0074	Direct/Rebuttal	Fuel Adjustment Clause Prudence
EO-2011-0390	Rebuttal	Resource Planning Fuel Adjustment Clause
ER-2011-0028	Rebuttal, Surrebuttal	Fuel Adjustment Clause
EU-2012-0027	Rebuttal, Surrebuttal	Fuel Adjustment Clause
ER-2010-0356	Rebuttal, Surrebuttal	Resource Planning Allocation of Iatan 2
EO-2010-0255	Direct/Rebuttal	
ER-2010-0036	Supplemental Direct, Surrebuttal	Fuel Adjustment Clause
ER-2009-0090	Surrebuttal	Capacity Requirements
ER-2008-0318	Surrebuttal	Fuel Adjustment Clause
ER-2008-0093	Rebuttal, Surrebuttal	Fuel Adjustment Clause Low-Income Program
ER-2007-0004	Direct, Surrebuttal	Resource Planning
GR-2007-0003	Direct	Energy Efficiency Program Cost Recovery
ER-2007-0002	Direct	Demand-Side Program Cost Recovery
ER-2006-0315	Supplemental Direct, Rebuttal	Energy Forecast, Demand-Side Programs Low-Income Programs
ER-2006-0314	Rebuttal	Jurisdictional Allocation Factor
EA-2006-0309	Rebuttal, Surrebuttal	Resource Planning
ER-2005-0436	Direct, Rebuttal, Surrebuttal	Low-Income Programs, Energy Efficiency Programs, Resource Planning
EO-2005-0329	Spontaneous	Demand-Side Programs, Resource Planning
EO-2005-0293	Spontaneous	Demand-Side Programs, Resource Planning
ER-2004-0570	Direct, Rebuttal, Surrebuttal	Reliability Indices, Energy Efficiency Programs Wind Research Program
EF-2003-0465	Rebuttal	Resource Planning
ER-2002-424	Direct	Derivation of Normal Weather
EC-2002-1	Direct, Rebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-2001-672	Direct, Rebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-2001-299	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EM-2000-369	Direct	Load Research
EM-2000-292	Direct	Load Research
EM-97-515	Direct	Normalization of Net System

Case No.	Filing Type	Issue
ER-97-394, et. al.	Direct, Rebuttal, Surrebuttal	Weather Normalization of Class Sales Weather Normalization of Net System Energy Audit Tariff
EO-94-174	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
ER-97-81	Direct	Weather Normalization of Class Sales Weather Normalization of Net System TES Tariff
ER-95-279	Direct	Normalization of Net System
ET-95-209	Rebuttal, Surrebuttal	New Construction Pilot Program
EO-94-199	Direct	Normalization of Net System
ER-94-163	Direct	Normalization of Net System
ER-93-37	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EO-91-74, et. al.	Direct	Weather Normalization of Class Sales Weather Normalization of Net System
EO-90-251	Rebuttal	Promotional Practices Variance
ER-90-138	Direct	Weather Normalization of Net System
ER-90-101	Direct, Rebuttal, Surrebuttal	Weather Normalization of Class Sales Weather Normalization of Net System
ER-85-128, et. al.	Direct	Demand-Side Update
ER-84-105	Direct	Demand-Side Update