FILED December 22, 2021 Data Center Missouri Public Service Commission

# Exhibit No. 50

Ameren Missouri – Exhibit 50 Mitchell Lansford Surrebuttal Testimony (Gas) File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.: 050 Issue(s): Revenue Requirement, Including True-up Witness: Mitchell Lansford Type of Exhibit: Surrebuttal Testimony Sponsoring Party: Union Electric Company File No.: GR-2021-0241 Date Testimony Prepared: November 5, 2021

# MISSOURI PUBLIC SERVICE COMMISSION

# FILE NO. GR-2021-0241

# SURREBUTTAL TESTIMONY

#### OF

#### **MITCHELL LANSFORD**

#### ON

### **BEHALF OF**

#### UNION ELECTRIC COMPANY

#### D/B/A AMEREN MISSOURI

St. Louis, Missouri November 5, 2021

# SURREBUTTAL TESTIMONY

#### OF

# MITCHELL LANSFORD

# FILE NO. GR-2021-0241

1	Q.	Please state your name and business address.
2	А.	My name is Mitchell Lansford. My business address is One Ameren Plaza,
3	1901 Choutea	au Ave., St. Louis, Missouri.
4	Q.	Are you the same Mitchell Lansford that submitted direct and rebuttal
5	testimony in this case?	
6	А.	Yes, I am.
7		I. <u>PURPOSE OF TESTIMONY</u>
8	Q.	What is the purpose of your true-up testimony in this proceeding?
9	А.	Pursuant to the Commission's Order Setting Procedural Schedule and
10	Adopting Test Year in this case, Ameren Missouri provided updated data through	
11	September 30	), 2021 for items to be trued-up in this case. <sup>1</sup> The purpose of my testimony is
12	to provide the Commission with the Company's revenue requirement, as updated through	
13	the true-up da	ate of September 30, 2021 using the true-up data for those items. <sup>2</sup>
14	Q.	Do you have any schedules supporting your surrebuttal testimony?

<sup>&</sup>lt;sup>1</sup> The Company provided true-up data for each item, except for Company Owned Life Insurance investment gains and losses that no party is recommending for inclusion in the revenue requirement, listed in footnote 4 of the referenced order. True-up data was provided for additional items, as referenced in prior testimony. <sup>2</sup> I followed the same methodology for each item being trued-up as was utilized in proposing a revenue requirement value for each item in my direct testimony.

Surrebuttal Testimony of Mitchell Lansford

A. Yes. I am sponsoring Schedules MJL-S1 through MJL-S17 relating to the Company's revenue requirement.<sup>3</sup> These schedules are the same as Schedules MJL-D1 through MJL-D17 included with my direct testimony, except they were prepared using data as of the true-up cutoff date established by the Commission in this case (September 30, 2021) for items being trued-up.

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#### II. <u>TRUE-UP OF REVENUE REQUIREMENT</u>

7 Q. What do Schedules MJL-S1 through MJL-S17 attached to this 8 testimony contain?

9 Schedules MJL-S1 through MJL-S17 show each component of the A. 10 Company's revenue requirement, as trued-up through September 30, 2021. In my direct 11 testimony, I quantified the Company's revenue requirement using certain adjustments 12 (projections) through the true-up date, as \$9,403,000 more than the pro forma operating 13 revenues at present rates. After replacing all projected amounts with actual results through 14 the true-up date, the Company's revenue requirement is \$7,535,000 more than operating 15 revenues at present rates. Consequently, it is necessary to set rates to produce \$85,002,000 16 annually in order to provide Ameren Missouri an opportunity to collect and recover its cost 17 of service, including an opportunity to recover its cost of capital.

#### Q. Does this conclude your surrebuttal testimony?

19 A. Yes, it does.

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<sup>&</sup>lt;sup>3</sup> My direct testimony also included what were labelled Schedule MJL-D13 and MJL-D18. MJL-D13 was the Depreciation Study and MJL-D18 contained cash working capital information that is not affected by the true-up.

# **BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI**

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust ) Its Revenues for Gas Service.

Case No. GR-2021-0241

# **AFFIDAVIT OF MITCHELL LANSFORD**

#### **STATE OF MISSOURI** ) ) ss **CITY OF ST. LOUIS** )

Mitchell Lansford, being first duly sworn on his oath, states:

My name is Mitchell Lansford, and on his oath declare that he is of sound mind and lawful

age; that he has prepared the foregoing Surrebuttal Testimony; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

> /s/Mitchell Lansford Mitchell Lansford

Sworn to me this 5<sup>th</sup> day of November, 2021.