

Exhibit No.:
Issues: *Report on Revenue
Requirement Cost of Service,
Overview of the Staff's Filing*
Witness: *Lisa M. Ferguson*
Sponsoring Party: *MoPSC Staff*
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Case No.: *GR-2021-0241*
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

LISA M. FERGUSON

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. GR-2021-0241

*Jefferson City, Missouri
September 3, 2021*

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OF

LISA M. FERGUSON

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

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1 **DIRECT TESTIMONY**

2 **OF**

3 **LISA M. FERGUSON**

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

6 **CASE NO. GR-2021-0241**

7 Q. Please state your name and business address.

8 A. Lisa M. Ferguson, 111 North 7th Street, Suite 105, St. Louis, MO 63101.

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

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

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

13 A. I attended Truman State University, receiving a Bachelor of Science degree
14 and a Master’s degree in Accounting in 2006 and 2008, respectively. Since joining the
15 Commission’s Staff in 2008, I have assisted with and directed audits and examinations of the
16 books and records of utility companies operating within the state of Missouri.

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

18 A. Yes, I have. Please refer to Schedule 1, which is included in Staff’s
19 Appendix 1, for a list of cases in which I have previously filed testimony as well as the issues
20 that I have addressed in testimony.

21 Q. What knowledge, skills, experience, training and education do you have in the
22 areas of which you are testifying as an expert witness?

23 A. I have been employed by this Commission as a Utility Regulatory Auditor for
24 over thirteen years and have submitted testimony on ratemaking issues numerous times before

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1 the Commission. I have also been responsible for the work product of other Commission
2 employees in rate cases and other regulatory proceedings. Since the time I began my
3 employment with the Commission, I have received training with regard to technical ratemaking
4 matters both in-house and through attending National Association of Regulatory Utility
5 Commissioners ("NARUC") sponsored regulatory seminars as well as other regulatory
6 symposiums and conferences.

7 Q. Have you participated in the Commission Staff's audit of Union Electric
8 Company, d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), concerning its request
9 for a rate increase in this proceeding?

10 A. Yes, I have, with the assistance of other members of the Staff. I am the Financial
11 and Business Analysis Division case coordinator facilitating the work of Staff members within
12 that Division, and I interface and work with the Staff members from other Commission
13 Divisions and Departments that are involved in the Staff's direct case.

14 **EXECUTIVE SUMMARY**

15 Q. Please summarize your direct testimony in this proceeding.

16 A. I am sponsoring the Staff's Revenue Requirement Cost of Service
17 Report ("Report") and Staff's Direct Accounting Schedules in this proceeding that are being
18 filed concurrently with this direct testimony. I also provide in this direct testimony an overview
19 of the Staff's revenue requirement determination. Staff has conducted a review of all the
20 components (capital structure, return on rate base, rate base, operating revenues and operating
21 expenses) that determine Ameren Missouri's revenue requirement. My testimony provides an
22 overview of Staff's work in each area.

1 **REVENUE REQUIREMENT COST OF SERVICE REPORT**

2 Q. Please explain the organizational format of the Staff's Revenue Requirement
3 Cost of Service Report.

4 A. The Staff's Report has been organized by topic as follows:

5 I. Executive Summary

6 II. Test Year/True-Up Period

7 III. Rate of Return (Capital Structure, Cost of Debt, Cost of Equity)

8 IV. Rate Base

9 V. Allocations

10 VI. Income Statement

11 VII. Depreciation

12 The Rate Base and Income Statement sections have numerous subsections which
13 explain each specific area and/or adjustments made by the Staff to the test year ending
14 December 31, 2020. The individual Staff member responsible for each area of Staff's
15 direct case and/or adjustment is identified in the Report following the written discussion he or
16 she authored, and is the expert/witness with respect to that section of the Staff's Report. The
17 Staff may have a different or additional expert/witness for rebuttal or surrebuttal testimony in
18 a given area if this case proceeds to evidentiary hearings.

19 **OVERVIEW OF STAFF'S RECOMMENDED REVENUE REQUIREMENT**

20 Q. How does one determine the revenue requirement for a regulated utility?

21 A. The first step is to calculate the utility's cost of service.

1 Q. In its audit of Ameren Missouri for Case No. GR-2021-0241, has Staff examined
2 all of the components comprising the cost of service for Ameren Missouri's gas operations in
3 Missouri?

4 A. Yes.

5 Q. What are the cost-of-service components that comprise the cost of service for a
6 regulated, investor-owned public utility?

7 A. The cost of service for a regulated, investor-owned public utility can be defined
8 by the following formula:

9 Cost of Service = Cost of Providing Utility Service

10 or

11
$$\text{COS} = \text{O} + (\text{V} - \text{D})\text{R} \quad \text{where,}$$

12
$$\text{COS} = \text{Cost of Service}$$

13 O = Operating Costs (Fuel, Payroll, Maintenance, etc.),
14 Depreciation and Taxes

15 V = Gross Valuation of Property Required for Providing Service
16 (including plant and additions or subtractions of other rate base
17 items)

18 D = Accumulated Depreciation Representing Recovery of
19 Gross Depreciable Plant Investment

20 V - D = Rate Base (Gross Property Investment less Accumulated
21 Depreciation = Net Property Investment)

22 (V - D)R = Return Allowed on Rate Base

23 In the past, the terms "cost of service" and "revenue requirement" have sometimes been
24 used interchangeably. However, in this rate case, Staff will use the term "revenue requirement"
25 to only refer to the utility's necessary incremental change in revenues based on measurement

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1 of the utility's current total cost of service compared to its current revenue levels under
2 existing rates.

3 Q. What is the objective of an audit of a regulated, investor-owned public utility for
4 ratemaking purposes?

5 A. The objective of an audit is to determine the appropriate level of the components
6 identified in my previous answer in order to calculate the revenue requirement for such a
7 regulated utility. All relevant factors are examined and a proper relationship of revenues,
8 expenses, and rate base is maintained. The process for making that revenue requirement
9 determination can be summarized as follows:

10 (1) Selection of a test year. The test year income statement represents the
11 starting point for determining a utility's existing annual revenues, operating costs and
12 net operating income. Net operating income represents the return on investment based upon
13 existing rates. The test year approved by this Commission for Case No. GR-2021-0241, is
14 the twelve months ending December 31, 2020. "Annualization," "normalization" and
15 "disallowance" adjustments are made to the test year results when the unadjusted amounts
16 do not fairly represent the utility's most current, ongoing and appropriate annual level of
17 revenues and operating costs. Annualization, normalization and disallowance adjustments are
18 explained in more detail later in this direct testimony.

19 (2) Selection of a "test year update period." A proper determination of
20 revenue requirement is dependent upon matching the rate base, return on investment, revenues,
21 and operating costs components at the same point in time. This ratemaking principle is
22 commonly referred to as the "matching" principle. It is a standard practice in ratemaking in
23 Missouri to utilize a period beyond the established test year in which to match the major

1 components of a utility's revenue requirement. By updating test year financial results to reflect
2 information beyond the established test year, rates can be set based upon more current
3 information. Due to the length of time between the end of the test year, December 31, 2020,
4 and the true-up cutoff, September 30, 2021, no update period has been established in this case.

5 (3) Selection of a "true-up date" or "true-up period." A true-up date
6 generally is established when a significant change in a utility's cost of service occurs after
7 the end of the test year (or, if applicable, the end of the update period), but prior to the
8 operation-of-law date, and the significant change in cost of service is one the parties and/or
9 Commission has decided should be considered for cost-of-service recognition in the current
10 case. The parties have agreed with a true-up cut-off date of September 30, 2021. The cost of
11 these and other changes will be considered for inclusion in the cost of service during the true-up
12 audit authorized by the Commission for this case.

13 (4) Determination of Rate of Return. A cost-of-capital analysis must
14 be performed to allow Ameren Missouri the opportunity to earn a fair rate of return on
15 its net investment ("rate base") used in the provision of utility service. Staff witness
16 Seoung Joun Won, PhD of the Commission's Financial Analysis Department, has performed a
17 cost-of-capital analysis and is sponsoring a section of the Staff's Revenue Requirement Cost of
18 Service Report to explain and provide the results of his analysis.

19 (5) Determination of Rate Base. Rate base represents the utility's
20 net investment used in providing utility service, on which the utility is permitted the opportunity
21 to earn a return.

22 (6) Net Operating Income from Existing Rates. The starting point
23 for determining net income from existing rates is the unadjusted operating revenues, expenses,

1 depreciation, and taxes for the test year which is the twelve-month period
2 ending December 31, 2020, for this case. All of the utility's specific revenue and expense
3 categories are examined to determine whether the unadjusted test year results require
4 adjustments in order to fairly represent the utility's most current level of operating revenues and
5 expenses. Numerous changes occur during the course of any year that will impact a
6 utility's annual level of operating revenues and expenses. The December 31, 2020, test year
7 has been adjusted to reflect the Staff's determination of the appropriate ongoing levels of
8 revenues and expenses. These items will be re-examined based on actual data as part of the
9 true-up process through September 30, 2021.

10 (7) Determination of Net Operating Income Required. The net income
11 required for Ameren Missouri is calculated by multiplying the Staff's recommended rate of
12 return by the rate base. Net income required is then compared to net income available from
13 existing rates discussed in Item 6 above. The difference, when factored-up for income taxes,
14 represents the incremental change in the utility's rate revenues required to cover its operating
15 costs and to provide a fair return on investment used in providing gas service.

16 If a utility's current rates are insufficient to cover its operating costs and provide a fair
17 return on investment, the comparison of net operating income required (Rate Base x
18 Recommended Rate of Return) to net income available from existing rates (Operating Revenue
19 less Operating Costs, Depreciation and Income Taxes) will result in a positive amount which
20 would indicate that the utility requires a rate increase. If the comparison results in a negative
21 amount, this indicates that the utility's current rates may be excessive.

22 Q. Please identify the types of adjustments which are made to unadjusted test year
23 results in order to reflect a utility's current annual level of operating revenues and expenses.

1 A. The types of adjustments made to reflect a utility’s current annual operating
2 revenues and expenses are:

3 (1) Normalization adjustments. Utility rates are intended to reflect normal
4 ongoing operations. A normalization adjustment is required when the test year reflects the
5 impact of an abnormal event. One example of this type of adjustment that is made in all gas
6 rate cases is the Staff’s revenue adjustments to normalize weather. Actual weather conditions
7 during the test year are compared to 30-year “normal” values. The weather normalization
8 adjustment restates the test year sales volumes and revenue levels to reflect normal
9 weather conditions.

10 (2) Annualization adjustments. Annualization adjustments are required
11 when changes have occurred during the test year, update and/or true-up period, which are not
12 fully reflected in the unadjusted test year results. For example, a portion of Ameren Missouri’s
13 employees received a wage increase on January 1, 2021. As a result, no part of the test year
14 reflects the impact of this payroll increase. An adjustment was made to capture the financial
15 impact of the payroll increase for the wage increase.

16 (3) Disallowance adjustments. Disallowance adjustments are made to
17 eliminate costs in the test year results that are not considered prudent, reasonable, appropriate,
18 and/or not of benefit to Missouri ratepayers and thus not appropriate for recovery from
19 ratepayers. An example in this case is certain executive incentive compensation costs. In the
20 Staff’s view, these costs are incurred to primarily benefit shareholder interests and it is not
21 appropriate policy to pass these costs on to customers in rates, since these costs do not benefit
22 ratepayers. Therefore, these costs should be eliminated from the cost of service borne by
23 ratepayers and the Staff has proposed to disallow these costs from recovery in rates.

1 (4) Pro forma adjustments. Pro forma adjustments reflect the impact of items
2 and events that occur subsequent to the test year. These items or events significantly impact the
3 revenue, expense and rate base relationship and should be recognized to address
4 the forward-looking objective of the test year. Caution must be exercised when including
5 pro forma adjustments in a recommended cost of service to ensure that all items and events
6 subsequent to the test year are also examined and any appropriate offsetting adjustments are
7 included as well. In addition, some post-test year items and events may not have occurred yet
8 and/or may not be capable of adequate quantification at the time of the case filing. As a result,
9 quantification of pro forma adjustments may be more difficult than the quantification of other
10 adjustments. As a consequence, use of a true-up audit that considers a full range of auditable
11 items and events that occur subsequent to the test year, attempts to address the maintenance of
12 the proper relationship among revenues, expenses and investment at a consistent point in time
13 is generally a superior approach than considering stand-alone pro forma adjustments for
14 inclusion in cost of service.

15 Q. What rate increase amount, based on what return on equity (“ROE”) percentage,
16 did the Company request from the Commission in this case?

17 A. Ameren Missouri requested that its annual revenues be increased by
18 approximately \$9,403,160 based on an ROE of 9.80%.

19 Q. Please describe Staff’s direct case revenue requirement filing in this proceeding.

20 A. The results of Staff’s audit of Ameren Missouri’s rate case request can be found
21 in the Staff’s filed Accounting Schedules and is summarized on Accounting Schedule 1,
22 Revenue Requirement. This Accounting Schedule shows that the Staff’s recommended
23 revenue requirement for Ameren Missouri in this proceeding is \$3,834,752 based upon a

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1 mid-point recommended rate of return (“ROR”) of 6.725%. Staff is recommending a
2 mid-point ROE of 9.50% with a range of 9.25% to 9.75% as calculated by Staff witness
3 Dr. Seoung Joun Won, PhD. Staff’s revenue requirement at low and high is \$3,335,801 to
4 \$4,333,701 based upon a ROR range of 6.599% to 6.851%.

5 Q. What items are included in the Staff’s recommended rate base in this case?

6 A. The rate base items include: Plant-in-Service, Accumulated Depreciation
7 Reserve, Cash Working Capital, Materials and Supplies, Prepayments, Stored Gas Inventory,
8 Customer Advances for Construction, Customer Deposits, Unamortized Pension and OPEBs
9 Tracking Assets and Liabilities, and the Accumulated Deferred Income Tax (“ADIT”) Reserve.
10 The Plant and Depreciation Reserve balances reflect the Staff’s estimates through the
11 September 30, 2021, true-up cut-off date. Other rate base items reflect various levels at or
12 beyond the end of the December 31, 2020, test year. These rate base components will be trued-
13 up through September 30, 2021, once the true-up data becomes available.

14 Q. What are the significant income statement adjustments the Staff made in
15 determining Ameren Missouri’s revenue requirement for this case?

16 A. A summary of the Staff’s significant income statement adjustments follows:

17 **Operating Revenues**

18 Retail revenues were adjusted for the elimination of unbilled revenue, PGA revenue,
19 gross receipts taxes, customer growth, the update period, deliverability charge revenue and
20 weather/days normalization.

21 Staff has also addressed a number of other issues in greater detail in the Staff’s Revenue
22 Requirement Cost of Service Report as shown in the partial listing below:

1 **Payroll, Payroll Taxes and Employee Benefit Costs**

- 2 • Payroll expense annualized for all known wage increases through
3 January 1, 2021, and changes in employee levels through June 30, 2021.
- 4 • Payroll taxes consistent with the payroll annualization and incentive
5 compensation removals.
- 6 • Incentive compensation and restricted stock awards disallowances.
- 7 • Employee benefits including pensions and OPEBs.

8 **Other Non-Labor Expenses**

- 9 • Customer Convenience Fees
- 10 • Distribution Maintenance Expense
- 11 • Rents and Leases
- 12 • Insurance Expense
- 13 • Property Tax Expense
- 14 • Uncollectible Expense
- 15 • Corporate Allocations
- 16 • Rate case expense adjustment.
- 17 • Disallowance of all institutional advertising expense, certain dues and
18 donations and miscellaneous expenses and Ameren Corporation board
19 of directors related costs.
- 20 • Income Taxes
- 21 • Depreciation Expense

22

23 Q. What reliance did you place on the work or conclusions of other Staff members
24 working on Staff's behalf?

25 A. All of the Staff auditors, including myself, relied on the work from numerous
26 other Staff members in calculating a revenue requirement for Ameren Missouri in this case.
27 Weather-normalized sales, depreciation rates and the recommended rate of return are some
28 examples of data and analysis supplied to the Auditing Unit as inputs into the Staff's revenue

1 requirement cost-of-service calculation. Signed affidavits and the qualifications for all Staff
2 members who are responsible for a section of the Staff's Revenue Requirement Cost-of-Service
3 Report and for whom that section constitutes direct testimony in this rate proceeding are
4 attached in an appendix to the Report. Each Staff member who is responsible for a section of
5 the Staff's Revenue Requirement Cost-of-Service Report is identified at the conclusion of the
6 section he or she authored as being the Staff expert/witness responsible for that section.

7 Q. What are the biggest differences between the rate increase request filed by the
8 Company and the Staff revenue requirement recommendations being filed in this proceeding?

9 A. From the Staff's perspective, there are five primary revenue requirement
10 differences.

- 11 • Return on Equity (ROE) and Capital Structure – Issue Value – (\$1.2 million).
12 As previously stated, Ameren Missouri's return on equity recommendation is
13 9.80%, while the Staff has developed a mid-point recommendation of 9.50%.
14 The dollar difference between Ameren Missouri's recommended ROE and
15 Staff's recommended mid-point for ROE, 9.80% compared to 9.50%, is
16 approximately \$1.2 million in revenue requirement.
- 17 • Payroll – Issue Value – (\$0.7 million). Staff has included Ameren Missouri's
18 employee headcount as of June 30, 2021. Ameren Missouri included temporary
19 employees in its headcount through September 30, 2021 in its direct filed
20 revenue requirement for which the actual headcount increase Staff has included
21 only permanent employees as of June 30, 2021.
- 22 • Low Income Weatherization – Issue Value – (\$0.7 million). Ameren Missouri
23 has erroneously included this amount twice in its direct revenue requirement.

1 Once in the operations & maintenance account and again in amortization
2 expense.

3 • Incentive Compensation - Issue Value (\$0.25 million). Ameren Missouri has
4 included a level of earnings based incentive compensation in its direct case for
5 which Staff has removed.

6 • Employee Benefits – Issue Value (\$0.12 million). Staff has included Ameren
7 Missouri’s employee headcount as of June 30, 2021. Ameren Missouri included
8 temporary employees in its headcount through September 30, 2021 in its direct
9 filed revenue requirement for which the actual headcount increase Staff has
10 included only permanent employees as of June 30, 2021.

11 There are other significant differences between the Staff and the Company, based upon
12 their respective direct filings. However, these items are less significant than the differences
13 discussed above.

14 Q. Is it possible that significant differences exist between the Staff’s revenue
15 requirement positions and those of other parties besides Ameren Missouri in this proceeding?

16 A. Yes. However, the other parties are filing their prepared direct testimony, if any,
17 concurrently with the Staff’s direct filing. Until Staff has a chance to examine the direct
18 testimony of the other parties, it is impossible for the Staff to determine what differences exist
19 and how material they may be.

20 Q. Please identify the Staff experts/witnesses responsible for addressing each area
21 where there is a known and significant difference between Staff and Ameren Missouri as
22 addressed above in this direct testimony.

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1 A. The Staff experts/witnesses for each listed issue are as follows:

2	<u>Issue</u>	<u>Staff Witness</u>
3	Rate of Return	Seoung Joun Won, PhD
4	Payroll	Paul K. Amenthor
5	Low Income/Weatherization Amortization	Jason Kunst, CPA
6	Incentive Compensation	Jason Kunst, CPA
7	Employee Benefits	Paul K. Amenthor

8
9 Q. When will the Staff be filing its customer class cost of service and rate design
10 direct testimony and report in this proceeding?

11 A. Staff's customer class cost of service and rate design direct testimony and report
12 and schedules will be filed on September 17, 2021.

13 Q. Does this conclude your prepared direct testimony in this proceeding?

14 A. Yes, it does.