

Exhibit No.:
Issue(s): *Employee Benefits*
Witness: *Paul K. Amenthor*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Up Rebuttal Testimony*
Case No.: *ER-2022-0337*
Date Testimony Prepared: *March 24, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS DIVISION

AUDITING DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

PAUL K. AMENTHOR

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

CASE NO. ER-2022-0337

Jefferson City, Missouri
March 2023

1 **TRUE-UP REBUTTAL TESTIMONY**

2 **OF**

3 **PAUL K. AMENTHOR**

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 Paul K. Amenthor, 111 N. 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”) as
11 a Senior Regulatory Auditor.

12 Q. Are you the same Paul K. Amenthor that filed direct and surrebuttal/true-up
13 direct in this case?

14 A. Yes, I am.

15 Q. What is the purpose of your true-up rebuttal testimony?

16 A. My true-up rebuttal responds to the true-up direct testimony and schedules
17 supporting Ameren Missouri’s true-up revenue requirement in Ameren Missouri witness
18 Mitchell Lansford’s testimony. Specifically, I address the employee benefits calculation.

19 **Employee Benefits**

20 Q. How did Ameren Missouri true-up employee benefits?

21 A. In two ways. First, the actual booked amounts through December 31, 2022
22 were included in the revenue requirement. Staff agrees with this approach. Second, Ameren
23 Missouri added benefits for the net employee additions through December 31 subsequent to the
24 March 31, 2022 test year. Staff does not entirely agree with this approach.

True-Up Rebuttal Testimony of
Paul K. Amenthor

1 Q. How does Staff compute the benefits for the remaining three months?

2 A. Staff's adjustment included benefits for employees hired subsequent to the test
3 year, i.e. benefits from April through December 31, 2022. These nine months of actual booked
4 amounts reflect 75% of the employee benefits expense for the new employees. Staff then
5 updated its annualized amount to include benefits for those employees for the remaining
6 three months of the year by multiplying the average benefits by the additional headcount to
7 arrive at the annualized amount and then multiplied that amount by 25% to account for the
8 remaining three months of expense. Staff's method accounts for 100% of the updated benefit
9 cost, whereas Ameren Missouri's method overstates the benefit costs.

10 Q. Does this conclude your true-up rebuttal testimony?

11 A. Yes it does.

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 PAUL K. AMENTHOR

STATE OF MISSOURI)
) ss.
COUNTY OF ST. LOUIS)

COMES NOW PAUL K. AMENTHOR and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *True-Up Rebuttal Testimony of Paul K. Amenthor*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

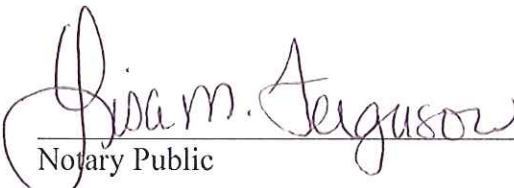


PAUL K. AMENTHOR

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the City of St. Louis, State of Missouri, at my office in St. Louis, on this 24th day of March 2023.

LISA M. FERGUSON
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 23, 2024
Commission Number: 16631502



Notary Public