

**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 Increase)
Its Revenues for Natural Gas Service) **Case No. GR-2019-0077**

**JOINT LIST OF ISSUES, LIST AND ORDER OF WITNESSES,
AND ORDER OF CROSS EXAMINATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and on behalf of itself and other parties in this case, submits its *Joint List of Issues, List and Order of Witnesses, and Order of Cross Examination* (“Joint List of Issues”) as directed by the Commission’s July 18, 2019 *Order Regarding Issues List and Statements of Position* (“Order”):

ORDER OF HEARING

Mark Exhibits

Entries of Appearance

Motions and Outstanding Matters

Opening Statements

Ameren Missouri
Staff
Division of Energy
Renew Missouri
National Housing Trust
Spire
Missouri School Board Association
Office of the Public Counsel

LIST AND ORDER OF ISSUES AND ORDER OF WITNESSES

Issues Agreed to by Signatory Parties

1. Regulatory Policy and Summary Testimony

Ameren Missouri – Warren Wood
Staff - Natelle Dietrich
Office of Public Counsel – Geoff Marke, Robert Schallenberg
2. What should be Ameren Missouri’s authorized revenue requirement?

Ameren Missouri – Laura Moore
Staff – Lisa Ferguson
Office of Public Counsel – John Riley, Robert Schallenberg
3. What is the appropriate capital structure?

Ameren Missouri – Darryl Sagel
Staff – Jeffrey Smith
Office of Public Counsel
4. What is the appropriate range for return on equity (ROE)?

Ameren Missouri – Robert Hevert
Staff – Jeffrey Smith
Office of Public Counsel- Geoff Marke
5. What is the appropriate ROE for Infrastructure System Replacement Surcharge (ISRS)?

Ameren Missouri – Robert Hevert
Staff – Natelle Dietrich
Office of Public Counsel
6. Should there be a property tax tracker? If so, what should it be?

Ameren Missouri – Laura Moore
Staff – Mark Oligschlaeger, Lisa Ferguson
Office of Public Counsel
7. Should there be a pension/OPEB tracker? If so, what should it be?

Ameren Missouri – Laura Moore
Staff – Lisa Ferguson
Office of Public Counsel

8. What amortizations of regulatory assets and liabilities should be used for setting rates in this case?

Ameren Missouri – Laura Moore
Staff – Lisa Ferguson
Office of Public Counsel- John Robinett

9. What should be the design and budget of Ameren Missouri's energy efficiency program?

Ameren Missouri – Laureen Welikson
Staff – Kory Boustead
Division of Energy – Martin Hyman
Office of Public Counsel – Geoff Marke

10. Who should administer the Company's Income Eligible Weatherization Assistance Program (IEWAP)?

Ameren Missouri – Laureen Welikson
Staff – Kory Boustead
Division of Energy – Martin Hyman
Office of Public Counsel – Geoff Marke

11. Should Ameren Missouri include in its rate design a volume indifference reconciliation to normal (VIRN) mechanism? If so, how should it be designed?

Ameren Missouri – Michael Harding
Staff – Robin Kliethermes, Michael Stahlman, Sarah Lange
Office of Public Counsel – Geoff Marke

12. How should depreciation be treated?

Ameren Missouri – John Widemayer
Staff – David Buttig
Office of Public Counsel- John Robinett

13. What changes should be made to the billing statement?

Ameren Missouri – Tom Byrne
Staff – Kim Cox
Division of Energy – Martin Hyman
Office of Public Counsel – Geoff Marke

14. When should Ameren Missouri file its next gas rate case?

Ameren Missouri – Laura Moore
Staff – Lisa Ferguson
Office of Public Counsel – Geoff Marke

15. What should the residential monthly customer charge be?

Ameren Missouri – Michael Harding
Staff – Robin Kliethermes, Kim Cox
Office of Public Counsel – Geoff Marke

16. How should the revenue requirement decrease be allocated to customer classes and what are the appropriate billing units to be applied?

17.

Ameren Missouri – Ryan Ryterski
Staff – Robin Kliethermes, Kim Cox
Office of Public Counsel – Robert Schallenberg

18. Should the Rolla Area PGA/ACA be consolidated with the system-wide PGA/ACA rate?

Ameren Missouri – Michael Harding
Staff – Anne Crowe

Additional Issues Suggested by Missouri School Board Association (MSBA)

1. MSBA's primary issue is that the current tariff cash-out rate for inadvertent over or under delivery of monthly gas volumes of schools is not cost-based per Section 393.310 RSMo., charges the schools a penalty price of the greater of 110% of the PGA price or the monthly spot market index plus \$0.15 per Ccf when the schools owe for inadvertent gas but the Company only pays 90% of monthly spot market index price if the schools are owed, and was established for large volume industrial type prior to Section 393.310 RSMo. becoming law in 2002;

2. MSBA's second issue is that rate provisions pertaining only to the school transportation should be in a separate rate schedule or separate section of the general transportation rate schedule for clarity of understanding and applicability; and,

3. MSBA's third issue is that all rate revenue reductions be equitably allocated within the transportation rate class to prevent discrimination to small volume transportation customers by allocating the class revenue reduction proportionately to all revenue-producing rate components based on test year pre-reduction non-rate revenue and not just on the second volumetric usage block which only large industrial-type users have sufficient usage to reach that rate block.

Ameren Missouri – Michael Harding
Staff – Keenan Patterson, Robin Kliethermes
Spire – Lewis Keathley
Missouri School Board Association (MSBA) – Louie Ervin
Office of Public Counsel

Additional Issues Suggested by the Office of Public Counsel

1. What should happen to any balance of the unspent energy efficiency funds?

Ameren Missouri – Laureen Welikson
Staff – Lisa Ferguson, Kory Boustead
Division of Energy – Martin Hyman
Office of Public Counsel- Geoff Marke

2. What depreciation rates should be ordered for the general plant accounts?

Ameren Missouri – John Wiedmayer
Staff – Dave Buttig
Office of Public Counsel – John Robinett

3. Should the Commission follow its policy of sharing rate case expense between shareholders and customers?

Ameren Missouri – Tom Byrne
Staff – Jason Kunst
Office of Public Counsel- Amanda Conner

4. What amount of management expenses should be included in this case?

Ameren Missouri – Tom Byrne
Staff – Jason Kunst
Office of Public Counsel- Amanda Conner

5. What should Ameren Missouri's weatherization program include?

Ameren Missouri – Laureen Welikson
Staff – Kory Boustead
Office of Public Counsel- Geoff Marke

6. What is the proper amount of depreciation study expense to be included in this case?

Ameren Missouri – John Widemayer
Staff – Lisa Ferguson
Office of Public Counsel – Amanda Conner

7. Has any inappropriate affiliate transaction expense been identified in this case?

Ameren Missouri – Laura Moore
Staff – Jason Kunst
Office of Public Counsel – Robert Schallenberg

ORDER OF CROSS-EXAMINATION

Ameren Missouri Witnesses

Staff
DE
Renew MO
NHT
Spire
MIEC
MSBA
OPC

MSBA Witnesses

MIEC
DE
Renew MO
NHT
OPC
Staff
Ameren Missouri

OPC Witnesses

MSBA
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Spire
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Ameren Missouri

Spire Witnesses

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Division of Energy Witnesses

MSBA
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MIEC
NHT
Renew Missouri
Staff
OPC

WHEREFORE, on behalf of the parties, Staff prays that the Commission will accept its *Joint List of Issues, List and Order of Witnesses, and Order of Cross Examination*; and rant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 19th day of July, 2019.

/s/ Robert S. Berlin