

*Exhibit No.:*  
*Issue:* Policy  
*Witness:* J Luebbert  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Direct Testimony  
*Case No.:* ER-2019-0335  
*Date Testimony Prepared:* December 18, 2019

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF**

**INDUSTRY ANALYSIS DIVISION**

**ENGINEERING ANALYSIS DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**J LUEBBERT**

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

**CASE NO. ER-2019-0335**

*Jefferson City, Missouri  
December 2019*

1 **DIRECT TESTIMONY**

2 **OF**

3 **J LUEBBERT**

4 **UNION ELECTRIC COMPANY,**  
5 **d/b/a Ameren Missouri**

6 **CASE NO. ER-2019-0335**

7 Q. Please state your name and business address.

8 A. My name is J Luebbert. My business address is 200 Madison Street, Jefferson  
9 City, Missouri 65101.

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

11 A. I am employed by the Missouri Public Service Commission ("Commission") as  
12 a Utility Engineering Specialist.

13 Q. Please describe your educational background and relevant work experience.

14 A. I received my Bachelor of Science degree in Biological Engineering from the  
15 University of Missouri in 2012. I was employed by the Missouri Department of Natural  
16 Resources as an Environmental Engineer from 2012 through 2016. I have been employed by  
17 the Commission since 2016 as a Utility Engineering Specialist and as Case Manager.

18 Q. Have you previously testified before the Commission?

19 A. Yes. My Case Summary is attached to my testimony as Schedule JL-d1.

20 **EXECUTIVE SUMMARY**

21 Q. What is the purpose of this Direct Testimony?

1           A.     The purpose of this Direct Testimony is to sponsor Staff’s Report on Class Cost  
2 of Service (“CCOS Report”), which includes the recommended rate design developed by Staff  
3 and described in the CCOS Report filed concurrently with this direct testimony.

4           Q.     Did Staff perform a Class Cost of Service (“CCOS”) study in this case?

5           A.     Yes it did.

6     **CCOS REPORT**

7           Q.     What is Staff’s recommendation in this case?

8           A.     As more specifically explained in the CCOS Report, Staff’s CCOS is designed  
9 to determine what rate of return is produced by each customer class on that class’s currently  
10 tariffed rates, for recovery of any calculated revenue requirement amount. For the reasons that  
11 will be discussed in more detail in the CCOS Report, due to the interrelationship of this case  
12 with the temporary tax rider and expected Ameren Missouri capital build-out, Staff does not  
13 recommend that revenue responsibility be realigned at this time.<sup>1</sup>

14          Q.     Does Staff recommend any new rate designs in its CCOS Report?

15          A.     Yes. Given the fact that Ameren Missouri is beginning to implement Advanced  
16 Meter Infrastructure (“AMI”), Staff is recommending that the Commission consider this case  
17 as an opportunity to begin Time of Use (“ToU”) rate design. Because Ameren Missouri will  
18 not complete deployment of AMI meters for some time, and in the interest of using these  
19 introductory ToU rates to educate customers about ToU with minimal customer impact, Staff’s  
20 recommended ToU rate design focuses on minimizing customer impact, and applying a gradual

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<sup>1</sup> On December 18th Staff became aware that Ameren Missouri was redoing its load research process for approximately half of its test period apparently prompted by Staff DR 517. As indicated on page 49 of the Staff Cost of Service Report, Staff was concerned that anomalies existed for certain months of data. The December 18th discussion further undermines Staff’s confidence in the reliability of this data. Reliable load research data is integral to a reasonable CCoS.

1 rollout of the rates. In the interest of the gradual rollout of ToU rates, Staff recommends that  
2 the Commission require Ameren Missouri to educate its existing customers regarding the  
3 impact of ToU rates on their bills prior to implementation of ToU rates by providing a shadow  
4 bill that indicates the usage in each time interval. Staff recommends that new customers with  
5 AMI meters be placed on a default ToU rate schedule unless they specifically request otherwise.

6 Q. Does Staff recommend any other noteworthy items in its CCOS Report?

7 A. Yes. In addition to the ToU rate design, and as discussed in more detail in the  
8 CCOS Report, Staff recommends:

- 9 1) Paperless Billin
- 10 2) Staff recommends revisions to Ameren Missouri's application of  
11 "Billing Period."
- 12 3) Staff recommends a number of data retention measures be implemented:
  - 13 a) Implement more thorough record keeping or data accessibility  
14 practices to better associate distribution system costs with the  
15 voltage of energy distributed;
  - 16 b) Take steps necessary in its AMI deployment process to provide  
17 accurate load research data at a high level of precision, by  
18 implementing practices to leverage AMI meter data for load  
19 research purposes;
  - 20 c) On an ongoing basis, Ameren Missouri should retain interval  
21 data for customers with AMI meters be retained for a minimum  
22 of a rolling 12 month time period so that customers may  
23 compare ToU options;
  - 24 d) Study and retain determinants associated with the creation of a  
25 coincident peak demand charge for all classes.
- 26 4) Staff recommends certain tariffs be updated as part of the compliance  
27 process in this case consistent with processes identified within those  
28 tariffs:
  - 29 a) Update the Facilities Charge on Tariff Sheet 158 (Community  
30 Solar Pilot Program) to reflect the changes made to the related  
31 energy charges, if applicable;

- 1                                   b) Update the Renewable Energy Standard Rate Adjustment  
2                                   Mechanism (“RESRAM”) Tariff Sheet No. 93.4 to reflect the  
3                                   RESRAM base amount determined in this case;
- 4                                   c) Update the MEEIA margin rates used for calculating the  
5                                   throughput disincentive within the MEEIA mechanism.
- 6                                   5) Staff recommends this case be taken as an opportunity to implement  
7                                   solutions to certain issues that have arisen in other contexts:
- 8                                   a) Clarify the billing process for ToU customers;
- 9                                   b) Revenue Treatment for Potential Customer Renewable Energy  
10                                   Credit Program;
- 11                                   c) Stipulation and Agreement in ET-2018-0132 concerning line  
12                                   extension record retention.
- 13                                   6) Staff recommends establishment of a ToU rate schedule to be applicable  
14                                   to separately-metered EV charging equipment, on an opt-in basis.<sup>2</sup>
- 15                                   7) Staff recommends modifications to the Fuel Adjustment Clause  
16                                   (“FAC”) base factor and transmission percentage.
- 17                                   Q.    Does this conclude your Direct Testimony?
- 18                                   A.    Yes it does.

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<sup>2</sup> At this time, Staff does not object to the general design proposed by Ameren Missouri for this purpose. Final design of this rate is dependent on the revenue requirement established in this matter.

**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 Decrease    )  
Its Revenues for Electric Service                )            Case No. ER-2019-0335

**AFFIDAVIT OF J LUEBBERT**

STATE OF MISSOURI     )  
  )        ss.  
COUNTY OF COLE     )

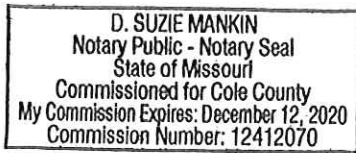
**COMES NOW J LUEBBERT** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of J Luebbert*; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.

**J LUEBBERT** 

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 18<sup>th</sup> day of December, 2019.



  
Notary Public

**J Luebbert**  
**Case Summary**

| <b>Case Number</b> | <b>Company</b>                            | <b>Issues</b>  |
|--------------------|---|--|
| EO-2015-0055       | Ameren Missouri                           | Evaluation, Measurement, and Verification  |
| EO-2016-0223       | Empire District Electric Company          | Supply-Side Resource Analysis, Transmission and Distribution Analysis, Demand-Side Resource Analysis, Integrated Resource Analysis |
| EO-2016-0228       | Ameren Missouri                           | Utilization of Generation Capacity, Plant Outages, and Demand Response Program   |
| ER-2016-0179       | Ameren Missouri                           | Heat Rate Testing  |
| ER-2016-0285       | Kansas City Power & Light Company         | Heat Rate Testing  |
| EO-2017-0065       | Empire District Electric Company          | Utilization of Generation Capacity and Station Outages   |
| EO-2017-0231       | Kansas City Power & Light Company         | Utilization of Generation Capacity, Heat Rates, and Plant Outages  |
| EO-2017-0232       | KCP&L Greater Missouri Operations Company | Utilization of Generation Capacity, Heat Rates, and Plant Outages  |
| EO-2018-0038       | Ameren Missouri                           | Supply-Side Resource Analysis, Transmission and Distribution Analysis, Demand-Side Resource Analysis, Integrated Resource Analysis |
| EO-2018-0067       | Ameren Missouri                           | Utilization of Generation Capacity, Heat Rates, and Plant Outages  |
| EO-2018-0211       | Ameren Missouri                           | Avoided Costs and Demand Response Programs   |
| EA-2019-0010       | Empire District Electric Company          | Market Protection Provision  |
| EO-2018-0211       | Ameren Missouri                           | Avoided Cost and Demand Response Programs  |
| GO-2019-0115       | Spire East                                | Policy   |
| GO-2019-0116       | Spire West                                | Policy   |
| EO-2019-0132       | Kansas City Power & Light Company         | Avoided Cost and Demand Response Programs  |