Exhibit No.:	
Issue(s):	*Overview of Staff's Filing, Various Adjustments*
Witness:	*Keith Majors*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Direct Testimony*
Case No.:	*ER-2022-0337*
Date Testimony Prepared:	*January 10, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY
Revenue Requirement

OF

KEITH MAJORS

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. ER-2022-0337

Jefferson City, Missouri
January 2023

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Q. Please state your name and business address.

A. Keith Majors, Fletcher Daniels Office Building, 615 East 13th Street, Room 201, Kansas City, Missouri, 64106.

Q. What is your current position at the Missouri Public Service Commission ("Commission")?

A. In 2022, I was promoted to my current position of Utility Regulatory Audit Supervisor within the Auditing Department, within the Financial and Business Analysis Division, of the Staff of the Commission.

Q. What is your educational background and work experience?

A. I attended Truman State University in Kirksville, Missouri, where I earned a Bachelor of Science degree in Accounting in 2007. I have been employed by the Missouri Public Service Commission ("Commission") since June 2007 within the Auditing Unit. I have been employed by the Commission as an auditor for 15 years.

Q. Have you previously filed testimony before this Commission?

A. Yes. A listing of the cases in which I have previously testified, or authored a Staff recommendation or memorandum, and the issues which I addressed in those filings, is attached as Schedule KM-d1 to this direct testimony.

Q. What knowledge, skills, experience, training and education do you have in the areas of which you are testifying here?

A. I have acquired knowledge of the ratemaking and regulatory process through my employment with the Commission and through my experience and analyses in numerous prior rate cases. I have assisted, conducted, and supervised audits and examinations of the books and records of public utility companies operating within the state of Missouri. I have participated in examinations of electric, industrial steam, natural gas, water, sewer and I have participated in in-house and outside training, and attended seminars on technical and general ratemaking matters while employed by the Commission.

EXECUTIVE SUMMARY

Q. What is the purpose of your direct testimony?

A. I am sponsoring Staff's Direct Accounting Schedules that are being filed concurrently with this direct testimony. Staff's recommendation of the amount of the rate revenue increase for Ameren Missouri operations are based on actual historical information using a test year of 12 months ending March 31, 2022 and through the update period of June 30, 2022. The only discrete adjustments that capture information past June 30 are related to the retirement of the Meramec Generating Station which retired on or before December 31 and adjustments that reflect the current operation of Rush Island Generating Station. In order to reflect what Staff currently expects the revenue requirement will be once the true-up is complete, Staff has included a true-up allowance. The allowance is an estimate of the projected rate revenue increase for true-up items. Staff will revise its recommendation of the amount of the revenue requirement increase for Ameren Missouri based on actual results for the true-up period ending December 31, 2022 when that information becomes available.

I also present an overview of the results of Staff's recommended revenue requirement for Ameren Missouri. Several members of Staff participated in Staff's examination of Ameren

Missouri's books and records for all the relevant and material components that make up the revenue requirement calculation. These components can be broadly defined as (1) capital structure and return on investment, (2) rate base investment and (3) income statement results, including revenues, operating and maintenance expenses, depreciation and amortization expense, and the taxes related to revenues and expenses.

I will provide also direct testimony concerning the issues listed in the table of contents in this testimony:

- **TEST YEAR REVENUE ADJUSTMENTS**
- **BAD DEBT EXPENSE AND FORFEITED DISCOUNTS**
- **RUSH ISLAND AND FERC ROE LEGAL FEES**
- **STORM COSTS**
- **VEGETATION MANAGEMENT & INFRASTRUCTURE INSPECTION**
- **ENERGY EFFICIENCY PROGRAM COST RECOVERY – MEEIA**
- **MCKINSEY CUSTOMER AFFORDABILITY STUDY**
- **RESRAM AMORTIZATION ADJUSTMENTS**
- **CRITICAL NEEDS LOW INCOME AMORTIZATION**
- **REHOUSING PILOT LOW INCOME PROGRAM AMORTIZATION**
- **MERAMEC TRACKER AND AMORTIZATION**
- **CUSTOMER DEPOSITS**
- **CUSTOMER ADVANCES**
- **MATERIALS AND SUPPLIES**
- **PREPAYMENTS**
- **PSC ASSESSMENT**
- **CORPORATE ALLOCATIONS**
- **EXITED FACILITIES**
- **ADVANCED METERING INFRASTRCTURE FEES**

Q. Through this testimony, do you provide any recommendations for expense and rate base levels to be reflected in the revenue requirement ordered in this case?

A. Yes. My various recommendations affect expense and rate base levels.

Q. Through this testimony, do you provide any adjustments to be applied to the level of current revenues, billing determinants, and Net System Input ("NSI")?

A. Yes. The test year revenue adjustments apply to level of current revenues.

REVENUE REQUIREMENT DIRECT TESTIMONY

Q. Briefly describe the direct testimony Staff has filed for this rate case.

A. Each member of Staff's direct testimony is organized by their sponsored issues, providing an explanation or description of each specific area and Staff's recommendation. Schedule KM-d2 attached to this testimony contains a list of Staff witnesses and the subjects upon which they testify.

OVERVIEW OF STAFF'S RECOMMENDED REVENUE REQUIREMENT

Q. How is the revenue requirement determined for a regulated utility?

A. The first step is to calculate the utility's cost of service. In its audit of Ameren Missouri for Case No. ER-2022-0337, Staff examined all of the components comprising the cost of service for Ameren Missouri's electric operations in Missouri.

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

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

Cost of Service = Cost of Providing Utility Service

or

COS = O + (V – D)R where,

COS = Cost of Service

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

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

D = Accumulated Depreciation Representing Recovery of Gross Depreciable Plant Investment

V – D = Rate Base (Gross Property Investment less Accumulated Depreciation = Net Property Investment)

(V – D)R = Return Allowed on Rate Base

In the past, the terms “cost of service” and “revenue requirement” have sometimes been used interchangeably. However, in this rate case, Staff will use the term “revenue requirement” to instead only refer to the utility’s necessary incremental change in revenues based on measurement of the utility’s current total cost of service compared to its current revenue levels under existing rates.

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

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

(1) Selection of a test year. The test year income statement represents the starting point for determining a utility’s existing annual revenues, operating costs, and net operating income. Net operating income represents the return on investment based upon existing rates. The test year approved by this Commission is the twelve months ending March 31, 2022. “Annualization,” “normalization,” and “disallowance” adjustments are made to the test year

results when the unadjusted amounts do not fairly represent the utility's most current, ongoing, and appropriate annual level of revenues and operating costs. Annualization, normalization, and disallowance adjustments are explained in more detail later in this direct testimony.

(2) Selection of a "test year update period." A proper determination of revenue requirement is dependent upon matching the rate base, return on investment, revenues, and operating costs components at the same point in time. This ratemaking principle is commonly referred to as the "matching" principle. It is a standard practice in ratemaking in Missouri to utilize a period beyond the established test year in which to match the major components of a utility's revenue requirement. By updating test year financial results to reflect information beyond the established test year, rates can be set based upon more current information. The update period approved by this Commission for this case is June 30, 2022.

(3) Selection of a "true-up date" or "true-up period." A true-up date is established when significant changes in a utility's cost of service occur after the end of the test year update period, but prior to the operation-of-law date, and the significant change in cost of service is one the parties and/or Commission has decided should be considered for cost-of-service recognition in the current case. In this proceeding, the Commission authorized a true-up period of December 31, 2022.

(4) Determination of Rate of Return. A cost-of-capital analysis was performed to determine the level of fair rate of return on Ameren Missouri's investment ("rate base") used in the provision of utility service. Staff witness Seoung Joun Won, PhD of the Commission's Financial Analysis Department, has performed a cost-of-capital analysis which he explains and provides the results of his analysis in his direct testimony.

(5) Determination of Rate Base. Rate base represents the utility's net investment used in providing utility service, on which the utility is permitted the opportunity to earn a return. For its direct filing, Staff has determined Ameren Missouri's rate base as of June 30, 2022, consistent with the end of the test year update period established for this case. Rate base includes plant-in-service (plant fully operational and used for service), cash working capital, materials and supplies, prepayments, fuel inventories, accumulated reserve for depreciation, accumulated deferred income tax, etc.

(6) Net Operating Income from Existing Rates. The starting point for determining net income from existing rates is the unadjusted operating revenues, expenses, depreciation, and taxes for the test year for this case. All of the utility's specific revenue and expense categories are examined to determine whether the unadjusted test year results require adjustments in order to fairly represent the utility's most current level of operating revenues and expenses. Numerous changes occur during the course of any year that will impact a utility's annual level of operating revenues and expenses. The test year has been adjusted to reflect the Staff's determination of the appropriate ongoing levels of revenues and expenses.

(7) Determination of Net Operating Income Required. The net income required for Ameren Missouri is calculated by multiplying Staff's recommended rate of return by the rate base. Net income required is then compared to net income available from existing rates discussed in Item 6 above. The difference, when factored-up for income taxes, represents the incremental change in the utility's rate revenues required to cover its operating costs and to provide a fair return on investment used in providing electric service. If a utility's current rates are insufficient to cover its operating costs and provide a fair return on investment, the comparison of net operating income required (Rate Base x Recommended Rate of Return) to

net income available from existing rates (Operating Revenue less Operating Costs, Depreciation, and Income Taxes) will result in a positive amount, which would indicate that the utility requires a rate increase. If the comparison results in a negative amount, this indicates that the utility's current rates may be excessive.

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

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

(1) Normalization adjustments. Utility rates are intended to reflect normal ongoing operations. A normalization adjustment is required when the test year does not reflect the level of costs going forward or reflects the impact of an abnormal event. One example of this type of adjustment that is made in all electric rate cases is Staff's revenue adjustments to normalize weather. Actual weather conditions during the test year are compared to 30-year "normal" values. The weather normalization adjustment restates the test year sales volumes and revenue levels to reflect normal weather conditions.

(2) Annualization adjustments. Annualization adjustments are required when changes have occurred during the test year, update and/or true-up period, which are not fully reflected in the unadjusted test year results. For example, Ameren Missouri's employees received a wage increase on January 1, 2022. Because Ameren Missouri's test year is for the twelve months ended March 31, 2022, this increase is not reflected in its test year payroll totals. As a result, in its calculation of payroll expense, Staff used payroll rates in effect at the end of the update period, June 30, 2022. The actual wage rates as of this date are applied to the actual employee levels to determine an annualized level of payroll expense. An adjustment to

the test year was made to capture the financial impact of the payroll increase to reflect the annualized payroll expense in effect at June 30. The same process will be used for the true-up, December 31.

(3) Disallowance adjustments. Disallowance adjustments are recommended to eliminate costs in the test year results that are not considered prudent, reasonable, appropriate, and/or not of benefit to Missouri ratepayers and thus not appropriate for recovery from ratepayers. An example in this case is certain executive incentive compensation costs. In Staff's view, these costs are incurred to primarily benefit shareholder interests and it is not appropriate policy to pass these costs on to customers in rates since these costs do not benefit ratepayers. Therefore, these costs should be eliminated from the cost of service borne by ratepayers and Staff has proposed to disallow these costs from recovery in rates. Staff witness Matthew Young addresses the issue of incentive compensation in his direct testimony and other disallowance adjustments are identified in other Staff witnesses' testimonies.

(4) Pro forma adjustments. Pro forma adjustments reflect the impact of items and events that occur subsequent to the test year and test year update period. These items or events significantly impact the revenue, expense, and rate base relationship and should be recognized to address the forward-looking objective of the test year. Caution must be exercised when including pro forma adjustments in a recommended cost of service to ensure that all items and events subsequent to the test year are also examined and any appropriate offsetting adjustments are included as well. In addition, some post-test year items and events may not have occurred yet and/or may not be capable of adequate quantification at the time of the case filing. As a result, quantification of pro forma adjustments may be more difficult than the quantification of other adjustments. A true-up audit that considers a full range of auditable items and events that

occur subsequent to the test year, and also attempts to address the maintenance of the proper relationship among revenues, expenses, and investment at a consistent point in time is generally a superior approach than considering stand-alone pro forma adjustments for inclusion in the cost of service. In support of its application to increase rates on August 1, 2022, Ameren Missouri included pro forma adjustments to estimate the effect of the true-up period on its proposed revenue requirement. It is Staff's understanding that Ameren Missouri will file an updated revenue requirement containing the actual investment, expenses and revenues incurred through December 31 in its true-up filing.

Q. What rate increase amount, based on what return on equity ("ROE") percentage, did Ameren Missouri request from the Commission in this case?

A. Ameren Missouri requested that its annual revenues be increased by approximately $315.6 million based on an ROE of 10.2%.

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

A. The results of Staff's audit of Ameren Missouri's rate case requests can be found in the Staff's filed Accounting Schedules and is summarized on Accounting Schedule 1, Revenue Requirement. This Accounting Schedule shows that Staff's recommended revenue requirement in this proceeding is $19,275,371. The recommended revenue requirements are based upon a mid-point recommended rate of return ("ROR") of 6.86%. Staff is recommending a mid- point ROE of 9.59% with a range of 9.34% to 9.84% as calculated by Staff witness Dr. Won. Staff's revenue requirement at the low and high ROR range of 6.73% to 6.99% is $1.4 million and $36.9 million.

Q. Did Staff include a true-up allowance in its Accounting Schedules?

A. Yes. Staff included a true-up allowance of $127.6 million. The allowance was determined by identifying costs that are likely to change during the true-up phase of the case. As discussed above, the true-up allowance will be replaced by actual costs incurred through December 31.

Q. What is Staff's recommended revenue requirement for Ameren Missouri including the true-up allowance?

A. Staff's recommended revenue requirement including the true-up allowance and based on Staff's recommended ROR is $146.8 million.

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

A. All rate base items were determined as of the update period ending date June 30, 2022, either through a balance on Ameren Missouri's books as of that date or a 13-month average balance ending on June 30. Items in Staff's rate base include: Plant-in-Service, Accumulated Depreciation Reserve, Cash Working Capital, Materials and Supplies, Fuel Inventories, Prepayments, Customer Deposits, Customer Advances, Accumulated Deferred Income Taxes, Pension and OPEBs tracker balances, and various regulatory asset and liability balances that are included in rate base.

Q. What are the significant income statement adjustments Staff made in determining Ameren Missouri's revenue requirements for this case?

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

Operating Revenues

Retail revenues were adjusted for the elimination of Fuel Adjustment Clause ("FAC") revenue, Missouri Energy Efficiency Investment Act ("MEEIA") revenue, Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") revenue, unbilled revenue, and gross receipts taxes. Revenues were also adjusted to reflect the update period and weather normalization.

Operating Expenses

- Fuel and Purchased Power Expense
- Payroll expense annualized for all known wage increases and changes in employee levels through June 30, 2022
- Payroll taxes consistent with the payroll annualization
- Incentive compensation and restricted stock awards disallowances
- Employee benefits including pensions and OPEBs
- Other Non-Labor Expenses
- Insurance Expense
- Property Tax Expense
- Uncollectible (Bad Debt) Expense
- Rate case expense
- Amortizations
- Income Taxes
- Depreciation Expense

Q. How do the various members of Staff contribute to a combined work product?

A. All of the Staff auditors, including myself, relied on the work from numerous other Staff members in calculating a revenue requirement for Ameren Missouri in this case. Weather normalized sales and the recommended rate of return are some examples of data and analysis supplied to the Auditing Department as inputs into Staff's revenue requirement cost of-service calculation. Each Staff member who contributed in calculating Staff's revenue requirement has submitted direct testimony in this case discussing the issues for which they were assigned and her or his recommendation. Signed affidavits and the qualifications for all Staff members who are responsible for issues addressed in Staff's direct testimony in this rate proceeding are attached to each Staff member's testimony.

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

A. From the Staff's perspective, there are five primary revenue requirement differences. However, the differences are based on Staff's adjustments through June 30. Whereas Ameren Missouri's adjustments are based on projections through December 31. The values listed below will change when Staff and the Company update their respective revenue requirements through the true-up period of December 31. The values listed below are estimated.

- Return on Equity (ROE) and Capital Structure – Issue Value – As previously stated, Ameren Missouri's return on equity recommendation is 10.2%, while the Staff has developed a mid-point recommendation of 9.59%. The difference between Ameren Missouri's recommended ROE and capital structure and Staff's recommended mid-point for ROE and capital structure is approximately $43 million in revenue requirement.
- Fuel and purchased power: Issue value- $134 million
- Rush Island Availability: $22.2 million
- Revenues: $18 million
- High Prairie Wind Farm Curtailment: $32.7 million

There are other differences between Staff and Ameren Missouri, based upon their respective direct filings but these items are less significant than the differences discussed above.

Q. Is it possible that significant differences exist between Staff's revenue requirement positions and those of other parties aside from Ameren Missouri in this proceeding?

A. Yes. The other parties to this rate case are filing their prepared direct testimony, if any, concurrently with the Staff's direct filing. Until Staff has a chance to examine the direct testimony of the other parties, it is impossible for Staff to determine what differences exist and how material they may be.

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

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

Issue **Staff Witness**

- ROE and Capital Structure: Seoung Joun Won, PhD
- Fuel and purchased power: Shawn E. Lange, Karen Lyons, Matthew R. Young
- Rush Island Availability: Claire M. Eubanks
- Revenues: Kim Cox and Keith Majors
- High Prairie Wind Farm Curtailment: Claire M. Eubanks

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

A. Staff's customer class cost of service and rate design direct testimony, including schedules, will be filed on January 24, 2023.

TEST YEAR REVENUE ADJUSTMENTS

Q. What revenue adjustments do you sponsor?

A. I am sponsoring the adjustments to remove revenue amounts recorded for MEEIA, RESRAM, and FAC. These revenues are determined in other proceedings and should not be considered revenues for the establishment of base rates. I also removed unbilled revenue and Gross Receipts Tax ("GRT") from the test year revenue amounts. Ameren Missouri acts as tax collector for certain taxes imposed on utility service revenues by municipalities and other taxing authorities. Since GRT is a pass through item, Staff has made an adjustment to remove the test year amounts from both Ameren Missouri's revenues and expenses in the cost-of-service calculation; however because of timing differences the adjustments may be similar but are not identical. The elimination of both the expense and revenues associated with the GRTs ensures that there will be no impact on the calculation of net income for revenue requirement purposes.

MEEIA was passed by the Missouri legislature and signed into law by the governor in 2009. The MEEIA program is designed to encourage Missouri's investor-owned electric utilities to offer energy efficiency programs and projects designed to reduce the amount of electricity used by the utility's customers. Commission rule 20 CSR 4240-20.093 makes available a Demand-Side Program Investment Mechanism that allows for the periodic rate recovery of MEEIA program costs, recovery of lost revenues related to the programs, and a utility performance incentive for investment in demand programs. As these program costs are recovered though the MEEIA Rate Rider mechanism rather than base rates, it is necessary to make an adjustment to exclude the MEEIA revenues from the calculation of electric retail revenues in the cost-of-service calculation.

In Case No. EA-2018-0202, the Commission approved Ameren Missouri's request for a RESRAM which allows Ameren Missouri to recover RES related capital investment and expenses through a rider mechanism between rate cases. As these RES related costs will be rebased into current rates in this case, it is necessary to make an adjustment to remove these revenues from the calculation of normalized and annualized revenues.

Ameren Missouri's fuel costs are currently collected through the FAC. In order to reflect a normal ongoing level of actual billed revenue, it is necessary to remove FAC revenue that were recorded during the test year.

Q. Did Staff review the amounts Ameren Missouri booked in its Other Revenues accounts?

A. Yes. These revenues include temporary installation profit, rent from electric property, and miscellaneous electric revenues. Staff's analysis of these amounts included a review of the revenues over the last two calendar years and through the updated period.

I have included an annualized level of building lease revenue for the lease revenue received from affiliates. I have also included a level of allocated lease expense to Ameren Missouri. All other miscellaneous revenues were included at the test year level. The test year Other Revenues amounts appear to be representative of an annualized level of revenue for each respective category identified above.

Q. Does Staff have concerns about the test year MEEIA revenues?

A. Yes. Staff is currently working with the Company to resolve these concerns to ensure the correct level of MEEIA revenues are removed from annualized rate revenues and are not commingled with other revenues.

Q. Briefly explain the adjustment for Callaway insurance proceeds.

A. Ameren Missouri recorded $87 million in insurance proceeds for the extended outage at the Callaway Nuclear Facility. Staff removed those proceeds from the test year revenues as those proceeds were included in FAC offsets.

BAD DEBT EXPENSE AND FORFEITED DISCOUNTS

Q. What is bad debt expense?

A. Bad debt expense is the portion of retail revenues Ameren Missouri was unable to collect from retail customers by reason of bill non-payment. After a certain amount of time has passed, delinquent customer accounts are written off and turned over to a third party collection agency for recovery. If the collection agency is subsequently able to successfully collect some portion of previously written off delinquent amounts owed, then those collected amounts reduce current write-offs. Offsetting successful collection agency recoveries against total write-offs creates the "net write-off" amount used to determine the annualized level of bad debt expense.

Q. How did you calculate a normal level of bad debt expense for Ameren Missouri?

A. Staff calculated the annualized bad debt expense by examining the past several years of bad debt expense. Bad debt expense was substantially impacted by the Covid-19 pandemic and mitigated by payment assistance programs. The most recent 12-month period of June 30, 2022 is most representative of an ongoing level.

Q. Will Staff examine bad debts in the true-up?

A. Yes.

Q. What are forfeited discounts?

A. They are commonly referred to as late payment fees. Ameren Missouri charges a late payment fee to customers who fail to pay bills in a timely manner. Staff annualized late payment fee revenues based on the test year amount adjusted for the fee decrease from 1.5% to 1%. This fee decrease was agreed to in the Unanimous Stipulation and Agreement in Case No. ER-2021-0240.

Q. Will Staff examine late payment fee revenue in the true-up?

A. Yes.

RUSH ISLAND AND FERC ROE LEGAL FEES

Q. What is the Rush Island Clean Air Act Ligation?

A. In 2011, the United States Environmental Protection Agency ("EPA") filed a case against Ameren Missouri for violating the Clean Air Act ("CAA") for not having the proper emission controls at the Rush Island Power Plant.

After several rounds of litigation, The United States Court of Appeals for the Eighth Circuit upheld the lower court's rulings finding that Ameren Missouri was liable under the applicable federal regulations. Consequently, Ameren Missouri made the decision to retire Rush Island.

Q. What is the FERC ROE complaint?

A. Ameren Missouri participated in three FERC ROE dockets (EL14-12 in November 2013, EL15-145 in February 2015 and ER15-358 in November 2014) as part of the MISO Transmission Owners Group ("MISO TO Group") that was represented by the law firm Wright & Talisman. Wright & Talisman hired a consultant to submit updated analysis on the appropriate rate of return on equity. Ameren Missouri (nor its affiliates) did not separately hire consultants; rather, the MISO TO Group as a whole utilized the services of the consultants and shared the associated costs.

Q. What is Staff's recommendation concerning the legal and consulting fees associated with these two issues?

A. Staff recommends removal of these expenses from the cost of service. The expenses incurred for the Rush Island litigation are non-recurring. The FERC ROE is a return on investment. ROE is the amount of revenue that is left-over after all expenses have been paid. Therefore, the FERC ROE legal fees were incurred for the benefit of the Company because the level of ROE is purely a benefit to shareholders and not customers. As such, customers should not have to pay the legal fees associated with arguing for a higher ROE.

STORM COSTS

Q. How did Staff normalize storm restoration costs?

A. In order to determine a normalized level of non-labor storm restoration expenses, Staff reviewed historical non-labor major related expenses for Ameren Missouri. Staff recommends inclusion of a normalized level of major storm restoration expense based upon a five year average ending June 30, 2022 which is consistent with past practice as variability exists in the level of storm costs experienced on a year to year basis. As part of its true-up audit, Staff will continue to review the actual non-labor major storm costs through December 31.

VEGETATION MANAGEMENT & INFRASTRUCTURE INSPECTION

Q. How did Staff normalize vegetation management and infrastructure inspection costs?

A. Staff reviewed the historical costs for the vegetation management program which show that the costs have decreased since Ameren Missouri implemented cost savings measures in 2019. Staff is recommending to include the 12 months ending June 30, 2022 as the annualized level of costs for vegetation management expenses. Staff will continue to review the actual costs and cost savings implementations for each of the programs through the end of the true-up period of December 31, and make further adjustments if necessary based upon updated information.

MEEIA PROGRAM COST RECOVERY

Q. What MEEIA costs are in the test year expenses?

A. All MEEIA costs are included in the test year level of expenses. These costs are recovered through the MEEIA surcharge, therefore Staff has removed these costs from the cost of service.

CUSTOMER AFFORDABILITY STUDY

Q. What is the customer affordability study?

A. Ameren Missouri incurred $9.6 million in total expenses related to a customer affordability study. Because this study will benefit future ratepayers, Staff recommends a five-year amortization of these expenses.

CRITICAL NEEDS LOW INCOME AMORTIZATION

Q. What is the Critical Needs Program?

A. The Critical Needs Program was developed as a result of the *Unanimous Stipulation and Agreement* in Case No. ER-2021-0240. The costs of development, implementation, and operation will be split 50/50 between customers and the Company for $500,000 total annually.

Staff has included one full year of the $250,000 cost to be recovered in the cost of service.

REHOUSING PILOT LOW INCOME PROGRAM AMORTIZATION

Q. What is the Rehousing Pilot Program?

A. The Rehousing Pilot Program was developed as a result of the *Unanimous Stipulation and Agreement* in Case No. ER-2021-0240. The costs of development, implementation, and operation will be split 50/50 between customers and the Company for $500,000 total annually.

Staff has included one full year of the $250,000 cost to be recovered in the cost of service.

MERAMEC AMORTIZATION AND ADJUSTMENTS

Q. What is the Meramec amortization?

A. Meramec was a coal-fired power plant that retired no later than December 31, 2022. Pursuant to the *Unanimous Stipulation and Agreement* in Case No. ER-2021-0240, Staff has reflected 1/5 of the amortization of $60.9 million agreed to in that stipulation.

Q. What was the source of the total deferral and what is it comprised of?

A. The deferral was identified in John Riley's rebuttal testimony in Case No. ER-2021-0240. The amount was comprised of $54.5 million of unrecovered capital costs of the facility and $6.4 million of operations and maintenance costs ("O&M"). The O&M costs were representative of 10 months of operating expenses that would be incurred in the period between the effective date of rates in that case, February 28, 2022, and the retirement of the plant, December 31, 2022.

Q. Does Staff recommend carrying costs on the unamortized balance?

A. No. No agreement was made concerning carrying costs in the aforementioned stipulation. The return on retired plant assets was addressed by the Commission in the most recent Evergy West rate case. In the *Amended Report and Order* in Case No. ER-2022-0130 the Commission ordered the following concerning the retired Sibley plant.

> Evergy also requests a return on the undepreciated amount of Sibley plant, acknowledging that it is no longer used and useful, and cites an academic treatise in support. Evergy also argues it should earn a return on and return of the NBV of Sibley as there is no authoritative reason not to permit it. Staff, MECG, and OPC argue against any authorized return on the undepreciated amount of Sibley.
>
> Historically, the Commission has distinguished between recovery based on prudent investment and recovery based on the asset being used and useful. The Commission is not persuaded by Evergy's argument and sees no reason to change its prior decisions. While it is appropriate to allow a utility to recover amounts prudently invested in plant, allow it a return of amounts spent, the fact that an initial investment may have been prudent when made does not support authorizing the Company to continue earning a profit/return on that investment when the plant in question is no longer used and useful. The Commission will allow recovery of the undepreciated amount of Sibley plant as the prudency of the investment in Sibley, including the 1991 and 2009 environmental retrofits, is unchallenged. The Commission will not authorize a return on that amount as none of that investment is now used and useful. Since the Commission is not allowing a return on the undepreciated amount of Sibley plant the issue on whether to use a weighted average cost of capital return on a going forward basis is moot.
>
> The Commission's denial of Evergy's request for a return on the undepreciated amount of Sibley plant coincides with its decision that the Sibley NBV should not continue to be included in rate base.
>
> [Case No. ER-2022-0130 *Amended Report and Order,* page 40]

Q. Other than the amortization of remaining net plant and O&M expense, what are the other Staff adjustments pertaining to the Meramec Generating Station?

A. There are several adjustments. They have been calculated in concert with the remaining cost of service items:

Plant in Service and Reserve:	Keith Majors
Materials and Supplies:	Keith Majors
Insurance Expense:	Antonija Nieto
Property Taxes:	Karen Lyons
Non-Labor Maintenance:	Antonija Nieto
Fuel, fuel adders, and fuel additives:	Matthew R. Young

Fuel expense has been accounted for in the fuel model results sponsored by Staff witness Shawn E. Lange, PE.

Q. How was Staff's Meramec plant and reserve adjustment calculated?

A. Staff captured the actual plant in service as of March 31. There are interim additions at Meramec that will not be retired and will be included in plant in service as of the true-up. The equal reduction to accumulated depreciation reserve was reduced by the $54.5 million of unrecovered capital costs in the Meramec amortization.

<u>CUSTOMER DEPOSITS</u>

Q. What are customer deposits?

A. Customer deposits are funds required to be provided by certain customers in order to initiate service as security against potential losses from failure to pay the utility for service provided. Since deposits are supplied by the customers, a representative level is deducted from Ameren Missouri's rate base to ensure that the utility does not earn a return on the value of these deposits.

Q. Is Ameren Missouri required to return the deposits to customers after a period of time?

A. Yes. After satisfactory payment over a twelve month period, Ameren Missouri must return the deposit including accrued interest.

Q. Is customer deposit interest included in Ameren Missouri's cost of service?

A. Yes. Since Ameren Missouri is required to refund the deposits including interest per their tariff, an appropriate level of expense should be included in the utility's cost of service.

Q. How is customer deposit interest expense determined?

A. Consistent with Ameren Missouri's tariff, Staff applied the most current prime interest rate published in the Wall Street Journal (3.25%) plus 100 basis points, for a total of 4.25% to its recommended customer deposit balance.

Q. Please explain Staff's recommended level of customer deposits included in rate base and the corresponding adjustment for customer deposit interest.

A. The amount Staff reflected for customer deposits on Accounting Schedule 2, Rate Base, is the balance as of June 30, 2022, for Ameren. The balance reflected on the Rate Base Accounting Schedule is the Missouri jurisdictional total for customer deposits. The June 30, 2022 balance was used because a downward trend in the customer deposits during the test year was noted for Ameren. In addition to the amount deducted from rate base for customer deposits, an amount for interest on customer deposits has been included as an adjustment to Staff's Accounting Schedule 9, the income statement.

CUSTOMER ADVANCES

Q. Please describe customer advances.

A. Customer advances are funds typically provided by construction developers to Ameren Missouri in order to fund electric infrastructure in areas that have potential for future development. These advances are also used by the utility to establish electric service for potential future customers without investing a substantial amount of money at the risk of the utility and its other customers. Unlike customer deposits, where Ameren receives these payments from prospective customers to obtain access to utility service, customer advances are provided to Ameren Missouri from certain customers that obligate Ameren Missouri to provide future electrical infrastructure and service for those future customers. Customer advances represent a recorded liability to recognize, and in most instances, the obligation to eventually return the funds advanced by customers to Ameren Missouri. The infrastructure constructed with these funds is not financed with debt or equity and, thus, ratepayers should not be obligated to pay a return on these plant investments. Consequently, customer advances are a reduction to Ameren Missouri's rate base.

Q. What is Staff's recommended treatment of Customer Advances?

A. Staff's recommended treatment of customer advances is to deduct from Ameren's rate base a 13-month average of customer advances account balances ending June 30, 2022. Staff utilized a 13-month average as the monthly balances for Ameren did not exhibit a discernable upward or downward trend. Staff's recommended level of customer advances are included as a reduction to Ameren's rate base on Accounting Schedule 2.

MATERIALS AND SUPPLIES

Q. Describe materials and supplies as they relate to Ameren.

A. Materials and supplies includes the cost of materials that are purchased primarily for use in the construction, operation, and maintenance of utility plant but are not directly assignable to specific plant accounts. Materials and supplies represent an investment in inventory for items such as spare parts, electric cables, poles, meters, and other miscellaneous items used in daily operations, maintenance, and construction activities by Ameren Missouri to maintain and build their production facilities and electric system.

Q. How did Staff evaluate Ameren Missouri's materials and supplies?

A. Staff examined each account individually to determine whether trends within an individual account existed over time and to determine an appropriate level that most accurately reflects the ongoing future investment costs of a particular account that should be included in the rate base.

Q. What is Staff's recommended treatment of Ameren Missouri's materials and supplies?

A. Staff reviewed the monthly balances for materials and supplies accounts from April 2021 to June 2022. If an upward or downward trend was detected, then Staff used the ending balance for that account. If there was no discernible trend, then a 13-month average was determined to be the most appropriate measure of the ongoing investment level for that account. Staff's recommended level of materials and supplies for Ameren is reflected in Staff's Accounting Schedules (Accounting Schedule 2).

PREPAYMENTS

Q. Please describe prepayments.

A. Prepayments are expenses that the Company pays in advance for the associated goods or services purchased. Since there are investment costs incurred by the utility when it prepays expenses, the company is allowed to earn a return on these amounts through inclusion in rate base. For example, Ameren Missouri prepays for property insurance to protect their assets in advance of the coverage period. Accordingly, the cost of that insurance policy is considered to be a prepaid asset and included in the rate base to allow a return on the unused portion of the prepaid asset. As the prepayments are consumed, an amount is charged to an expense account in the income statement.

Q. What is Staff's recommended treatment for prepayments?

A. Staff's recommended treatment of prepayments is to examine each prepayment account individually in order to determine an appropriate measure that most accurately predicts the ongoing future investment costs of a particular prepayment account, and then to include the appropriate level of prepayments in Ameren Missouri's rate base. Staff included amounts in rate base for all prepayments required for Ameren to provide electric utility service to their customers. Staff examined all of Ameren prepayment account balances from April 2021 to June 2022 on a month-by-month basis.

Q. How did Staff determine the levels of prepayments to be included in Ameren Missouri's rate base?

A. For accounts where there was no discernible upward or downward trend in the monthly balances, Staff calculated an average based on balances for the 13-months ending June 30, 2022. For accounts where a noticeable upward or downward trend was present, Staff used the most recent account balances (June 30, 2022).

MISSOURI PUBLIC SERVICE COMMISSION (PSC) ASSESSMENT

Q. Please describe the PSC Assessment.

A. The PSC Assessment is the amount billed to all regulated utilities by the Missouri Public Service Commission, which funds the PSC's operations. The total budget of the PSC is billed to all regulated utility companies in allocation based on several factors such as the company's intrastate revenue. The required funding level from each utility is re-evaluated each year and a new assessment is billed to each regulated utility on July 1.

Q. How did Staff annualize the PSC assessment expense?

A. Staff annualized this expense by using the last known PSC assessment as determined on July 1, 2022.

CORPORATE ALLOCATIONS

Q. Please describe Ameren Missouri's corporate allocations.

A. A subsidiary of Ameren Corporation, Ameren Services Company ("AMS"), provides various management and administrative support services to Ameren Missouri and affiliate companies. As part of its audit process, Staff reviewed the methods used by Ameren Services to assign and allocate costs to Ameren Missouri's electric and gas operations. Under AMS' corporate cost allocation system, costs are categorized into four types:

1) Direct – Costs that can be identified as being applicable to products or services provided to a single affiliate;

2) Direct Allocated – Costs that can identified as being applicable to products or services provided to two or more affiliates;

3) Functional Indirect – Costs such as office supplies and administrative labor accumulated by functional area and allocated to all affiliates based on the ratio of total direct and direct allocated costs charged to each affiliate;

4) Corporate Indirect – Costs such as the Service Company's banking activities and rent allocated based on the ratio of total direct and directly allocated costs charged to each affiliate.

Q. Do you have any recommended adjustments for corporate allocations?

A. Yes. Staff has included adjustments for corporate allocations for allocations to Ameren Missouri for the months in the test year occurring during 2021 reflecting the 2022 corporate allocations. Staff also included adjustments for electric costs that were allocated to gas operations in the test year.

<u>EXITED FACILITIES</u>

Q. Please explain the exited facilities adjustment.

A. This adjustment removes expenses and revenues from recently exited facilities including the Bank of America lease and the Sunset Hills Office.

<u>ADVANCED METERING INFRASTRUCTURE FEES</u>

Q. Please explain this adjustment.

A. This adjustment recognizes reduced meter reading fees based on progress Ameren Missouri has made in the advanced metering infrastructure ("AMI") deployment. Staff included 12 months of expense based on March 31, 2022 data. Staff will examine the costs through the true-up to determine the proper level of meter expenses.

Q. Does this conclude your direct testimony?

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 KEITH MAJORS

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

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

Further the Affiant sayeth not.

Keith Majors

KEITH MAJORS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the City of Jackson, State of Missouri, at my office in Kansas City, on this 6th day of January 2023.

JaNiece Davis

Notary Public

JANIECE DAVIS
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES FEBRUARY 13, 2026
JACKSON COUNTY
COMMISSION #22076386

Keith Majors
Case Participation

Cases to which I have been assigned and have filed testimony, Staff report, or memorandum are shown in the following table:

Utility	Case Number	Issues	Exhibit
Ameren Missouri - Electric	EC-2023-0037	Pending	Pending
Ameren Missouri - Electric	ER-2022-0337	Revenues, Allocations, Bad Debt, Various	Direct Testimony
Spire Missouri	GO-2022-0171	ISRS	Staff Memorandum
Evergy Metro and Evergy West	ER-2022-0129 & ER-2022-0130	Revenues, Jurisdictional Allocations, Bad Debt, Sibley Retirement	Direct, Rebuttal, Surrebuttal Testimony
Ameren Missouri	ER-2021-0240 & GR-2021-0241	Facilities Transactions	Surrebuttal Testimony
Spire Missouri	GR-2021-0108	Corporate Allocations, Rate Case Expense	Staff Report, Rebuttal, Surrebuttal
MAWC	SA-2021-0074	CCN	Staff Memorandum
Evergy Metro and Evergy West	EO-2021-0032	Various	Staff Report
Spire Missouri	GO-2021-0030 & GO-2021-0031	ISRS	Staff Memorandum
Raytown Water	WR-2020-0264	Various	Staff Memorandum
Summit Natural Gas	GA-2020-0251	CCN	Staff Memorandum
Liberty Utilities	WM-2020-0174	CCN	Staff Memorandum
Missouri American Water Company (MAWC)	WA-2019-0366	CCN	Staff Memorandum
Ameren Missouri	ER-2019-0335	Allocations, Affiliation Transactions	Staff Report
MAWC CCN	SA-2019-0367	CCN	Staff Memorandum
United Services	SA-2019-0161	CCN	Staff Memorandum
KCP&L & KCP&L GMO	ER-2018-0145 & ER-2018-0146	Synergy and Transition Costs Analysis, Transmission Revenue and Expense	Staff Report
Laclede Gas and Missouri Gas Energy	GR-2017-0215 & GR-2017-0216	Synergy and Transition Costs Analysis, Corporate Allocations	Staff Report, Rebuttal, Surrebuttal

KCP&L & KCP&L GMO	ER-2016-0156 & ER-2016-0285	Income Taxes, Pension & OPEB	Staff Report, Rebuttal, Surrebuttal
KCP&L & KCP&L GMO	EO-2016-0124	Pensions, Rate Comparison	Staff Report
KCP&L & KCP&L GMO	EC-2015-0309	Affiliate Transactions, Allocations	Surrebuttal Testimony
KCP&L	ER-2014-0370	Income Taxes, Pension & OPEB, Revenues	Staff Report, Rebuttal, Surrebuttal
KCP&L	EU-2015-0094	DOE Nuclear Waste Fund Fees	Direct Testimony
KCP&L	EU-2014-0255	Construction Accounting	Rebuttal Testimony
Veolia Kansas City	HR-2014-0066	Income Taxes, Revenues, Corporate Allocations	Staff Report
Missouri Gas Energy	GR-2014-0007	Corporate Allocations, Pension & OPEB, Incentive Compensation, Income Taxes	Staff Report, Rebuttal, Surrebuttal
Missouri Gas Energy ISRS	GO-2013-0391	ISRS	Staff Memorandum
KCP&L & KCP&L GMO	ER-2012-0174 & ER-2012-0175	Acquisition Transition Costs, Fuel, Legal and Rate Case Expense	Staff Report, Rebuttal, Surrebuttal
Missouri Gas Energy ISRS	GO-2011-0269	ISRS	Staff Memorandum
Noel Water Sale Case	WO-2011-0328	Sale Case Evaluation	Staff Recommendation
KCP&L & KCP&L GMO	ER-2010-0355 & ER-2010-0356	Acquisition Transition Costs, Rate Case Expense	Staff Report, Rebuttal, Surrebuttal
KCP&L Construction Audit & Prudence Review	EO-2010-0259	AFUDC, Property Taxes	Staff Report
KCP&L, KCP&L GMO, & KCP&L GMO – Steam	ER-2009-0089, ER-2009-0090, & HR-2009-0092	Payroll, Employee Benefits, Incentive Compensation	Staff Report, Rebuttal, Surrebuttal
Trigen Kansas City	HR-2008-0300	Fuel Inventories, Rate Base Items, Rate Case Expense, Maintenance	Staff Report
Spokane Highlands Water Company	WR-2008-0314	Plant, CIAC	Staff Recommendation
Missouri Gas Energy ISRS	GO-2008-0113	ISRS	Staff Memorandum

Ameren Missouri General Rate Case
Case No. ER-2022-0337
Direct Testimony-Staff Responsibility

Staff Witness	Issue Responsibility
Paul K. Amenthor	Payroll and Benefits, Payroll Taxes
Alan J. Bax	System Energy Losses, Voltage Adjustment Factors, Loss Study
Amanda Coffer	Cape Girardeau and Sioux Landfill In-service criteria
Amanda C. Conner	Fuel Adjustment Clause
Kimberly Cox	Rate Revenues
Cedric E. Cunigan	Depreciation
Claire Eubanks, P.E.	High Prairie Wind Curtailment, Rush Island, Smart Energy Plan
Sarah Fontaine	Customer Billing Issues, EE-2019-0382 variance and tariff review
Jared Giacone	Cash Working Capital; Leases; Pensions and OPEB's; Rate Case Expense; SERP; Board of Director Fees, Sales and Use Tax Audits, Severance
Nancy L. Harris	Large Primary Service Operating Revenues
Shawn E. Lange, P.E.	Variable Fuel and Purchased Power Expense, Real Time Deviation, Rush Island
Karen Lyons	Pay As You Save program, Capacity and Energy Sales, Purchased Power, Mid-Continent Independent System Operator (MISO) Costs, Rush Island System Support Resource Compensation, MISO Transmission Revenue and Expense, Southwest Power Pool Energy Revenue and Expense, FERC ROE Complaint Cases, Emission Allowance and Renewable Energy Credits, Property Tax Expense, Paperless Bill Credit, Electric Vehicle Employee Incentive, Charge Ahead, Keeping Current and Keeping Cool Program Costs, Income Eligible Weatherization Assistance Program Costs, Renewable Energy Standard (RES), RES Rate Adjustment Mechanism, COVID-19 Regulatory Asset and Amortization, Equity Issuance Amortzation
Keith Majors	Test Year Revenue Adjustments, Bad Debt Expense and Forfeited Discounts, Rush Island and FERC ROE Legal Fees, Storm Costs, Vegetation Management and Infrastructure Inspection, MEEIA Program Cost Recovery, Customer Affordability Study, Critical Needs Low Income Program, Rehousing Pilot Low Income Program, Meramec Amortization, Customer Deposits and Advances, Materials and Supplies, Prepayments, PSC Assessment, Corporate Allocations, Exited Facilities, Advanced Metering Infrastructure Fees
Antonija Nieto	Insurance, Call Center Costs, Power Plant Maintenance, Software Rental Revenue and Expense, Software Maintenance Expense, Cyber Security Costs, Customer Convenience Fees, Advertising, Dues and Donations, Plant in Service Accounting, Callaway Refueling, Callaway Unplanned Outage
Dr. Hari K. Poudel	365 Day adjustment, weather variables, weather normalization, hourly load requirement, energy efficiency adjustment
Michael L. Stahlman	Rate Block Adjustments for normalized usage
Justin Tevie	Market Energy Prices
Dr. Seoung Joun Won	Rate of Return and Capital Structure
Matthew Young	Plant in Service and Accumulated Depreciation Reserve, Sioux Regulatory Assets, Extended Amortzations, Capitalized Depreciation and Rail Car Depreciation, Intangible Plant Amortization, Nuclear Regulatory Commission Fees, Nuclear Waste Disposal, Long-Term and Short-Term Incentive Compensation, Exceptional Performance Bonus, Fuel Expense, Fuel Inventory, Current Income Tax Expense, Deferred Income Tax Expense, Accumulated Deferred Income Tax Expense, Inflation Reduction Act, Capitalized Overheads