Exhibit No:Issues:Lobbying Labor<br/>AdjustmentWitness:Jason KunstSponsoring Party:MoPSC StaffType of Exhibit:Rebuttal Testimony<br/>Case No.Case No.ER-2016-0179Date Testimony Prepared:January 20, 2017

# MISSOURI PUBLIC SERVICE COMMISSION

### **COMMISSION STAFF DIVISION**

## AUDITING DEPARTMENT

## **REBUTTAL TESTIMONY**

#### OF

# JASON KUNST

# UNION ELECTRIC COMPANY d/b/a Ameren Missouri

## CASE NO. ER-2016-0179

Jefferson City, Missouri January 2017

\*\* Denotes Highly Confidential Information \*\*

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1		<b>REBUTTAL TESTIMONY</b>		
2		OF		
3		JASON KUNST		
4 5		UNION ELECTRIC COMPANY d/b/a Ameren Missouri		
6		CASE NO. ER-2016-0179		
7	Q.	Please state your name and business address.		
8	А.	Jason Kunst, 111 N. 7th Street, Suite 105, St. Louis, MO 63101.		
9	Q.	By who are you employed and in what capacity?		
10	А.	I am employed by the Missouri Public Service Commission ("Commission")		
11	as a Utility Regulatory Auditor III.			
12	Q.	Are you the same Jason Kunst who contributed to Staff's Revenue		
13	Requirement Cost of Service Report filed in this case on December 9, 2016?			
14	А.	Yes.		
15	Q.	Please provide a brief summary of the purpose of your rebuttal testimony.		
16	А.	My rebuttal testimony addresses Ameren Missouri witness Laura Moore's		
17	direct labor position and clarifies Staff's proposed adjustment to Ameren Missouri's payroll			
18	for time spent on lobbying and legislative activities.			
19	Q.	Please describe the adjustment made by Staff in its direct filing.		
20	А.	Staff had submitted Data Request No. 490 **		
21				
22				
23		**		
24	Additionally	Staff had requested **		

# Rebuttal Testimony of Jason Kunst

1		** Staff included a placeholder adjustment to disallow lobbying related			
2	test year payroll in its direct filing until it could fully review the responses to Data Request				
3	Nos. 490 and 517.				
4	Q.	Has Staff received a response to the aforementioned Data Requests?			
5	А.	Yes. Staff received a response to Data Request No. 517 on December 8, 2016,			
6	and a response to Data Request No. 490 on January 6, 2017.				
7	Q.	Has Staff made any changes to the placeholder adjustment that was included in			
8	its direct testimony?				
9	А.	Not at this time. Due to the volume of information requested, Staff will			
10	require additi	onal time to review the information and will most likely propose an adjustment			
11	as part of Staff's surrebuttal filing.				
12	Q.	Does this conclude your rebuttal testimony?			
13	А.	Yes.			

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#### **BEFORE THE PUBLIC SERVICE COMMISSION**

#### **OF THE STATE OF MISSOURI**

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Electric Service

Case No. ER-2016-0179

#### **AFFIDAVIT OF JASON KUNST**

STATE OF MISSOURI	)	
	)	SS.
CITY OF ST. LOUIS	)	

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

Further the Affiant sayeth not.

JASON/KUNST

#### 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  $\cancel{12}$  day of January, 2017.

LISA M. FERGUSON Notary Public - Notary Seal State of Missouri Commissioned for St. Louis County My Commission Expires: June 08, 2020 Commission Number: 16631502

Da 1 Notary Pub