

Exhibit No.:
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Witness: Laura M. Moore
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Sponsoring Party: Union Electric Company
File No.: ER-2022-0337
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2022-0337

REBUTTAL TESTIMONY

OF

LAURA M. MOORE

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
February 2023**

REBUTTAL TESTIMONY

OF

LAURA M. MOORE

FILE NO. ER-2022-0337

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Laura M. Moore. My business address is One Ameren Plaza,
4 1901 Chouteau Ave., St. Louis, Missouri.

5 **Q. Are you the same Laura M. Moore that submitted direct testimony in**
6 **this case?**

7 A. Yes, I am.

8 **Q. To what testimony or issues are you responding?**

9 A. My rebuttal testimony responds to Staff witness Antonija Nieto's direct
10 testimony regarding Edison Electric Institute ("EEI") dues.

11 **Q. Please explain Staff's position on EEI dues as discussed in Staff witness**
12 **Nieto's testimony.**

13 A. Staff has excluded EEI dues in the amount of approximately \$600,000 from
14 Ameren Missouri's revenue requirement because of EEI's involvement in lobbying activities.

15 **Q. Do you agree that a portion of EEI's dues should be excluded in support of**
16 **the lobbying activities?**

17 A. No additional amount needs to be removed from the Company's revenue
18 requirement. Ameren Missouri recorded the lobbying portion of the EEI dues "below-the-line"
19 and, as the Commission is aware, any costs recorded "below-the-line" are already excluded from

1 the revenue requirement calculated by Ameren Missouri in the Company's direct filing. To
2 exclude any additional amounts would be excluding that amount twice.

3 **Q. Staff includes a list of lobbying work that EEI was involved in during 2022.**
4 **Is that an exhaustive list of EEI activities and benefits received by Ameren Missouri?**

5 A. No. The Staff testimony only discusses the lobbying activities of EEI, but Staff
6 witness Nieto admits that there are several EEI activities that benefit ratepayers.

7 **Q. What are the other considerations that justify including membership dues**
8 **in Ameren Missouri's revenue requirement?**

9 A. Ms. Nieto includes a quote from a prior KCP&L Case regarding this topic,
10 which states that benefits to ratepayers must be considered. In KCP&L Case No. ER-82-66,
11 the Commission stated the following: "...until the Company (KCP&L) can better quantify the
12 benefit and the activities that were the causal factor of the benefit, the Commission must
13 disallow EEI dues as an expense."¹

14 **Q. Did the Company provide any testimony quantifying the benefits of its**
15 **membership in EEI?**

16 A. Yes, I quantified specific benefits in my direct testimony, which Ms. Nieto
17 neither addressed nor disputed. In that testimony, I also discussed the many benefits of our
18 membership in EEI. Regarding quantified benefits, I specifically demonstrate that the
19 Company's participation in the EEI Mutual Assistance Program saved the Company between
20 \$5 and \$6 million in the test year alone. Although I do not attempt to quantify all of the benefits
21 received from EEI, this benefit from the Mutual Assistance Program participation alone justifies
22 the cost of Ameren Missouri's EEI dues.

¹ See *In the Matter of Kansas City Power & Light Co.*, 28 MO P.S.C. (N.S.) 228, 259 (1986).

Rebuttal Testimony of
Laura M. Moore

1 **Q. Does this conclude your rebuttal testimony?**

2 **A. Yes, it does.**

