

Exhibit No.:
Issue(s): Expense/Misc. A&G
Expense
Witness: Paul K. Amenthor
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: ER-2019-0335
Date Testimony Prepared: January 21, 2020

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

REBUTTAL TESTIMONY

OF

PAUL K. AMENTHOR

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. ER-2019-0335

*Jefferson City, Missouri
January 2020*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **PAUL K. AMENTHOR**

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. Paul K. Amenthor, 111 N. 7th street, Suite 105, St. Louis, MO 63101.

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

10 A. I am employed by the Missouri Public Service Commission ("Commission") as
11 a Utility Regulatory Auditor.

12 Q. Are you the same Paul K. Amenthor who contributed to *Staff's Revenue*
13 *Requirement Cost of Service Report* filed on December 4, 2019 in this case?

14 A. Yes, I am.

15 Q. What is the purpose of your rebuttal testimony in this proceeding?

16 A. My rebuttal testimony will respond to the direct testimony of Ameren Missouri
17 witness Laura Moore's proposal to increase operating expenses for various MEEIA related
18 administrative and training costs.

19 Q. What is Ameren Missouri's proposal regarding the MEEIA related costs?

20 A. On page 25, lines 17-19 of her direct testimony, Ameren Missouri witness Laura
21 Moore proposes inclusion of approximately \$337,000 in administrative and training costs that
22 Ameren Missouri sought approval for inclusion in the MEEIA rider mechanism. Staff reviewed
23 the case filings in the first MEEIA cycle 2 prudence review docket, Case No. EO-2018-0155.

1 On page 14, lines 5 through 7 of the Staff recommendation in that case, Staff concluded that:
2 “Staff believes any out of state traveling and training should be considered an indirect labor
3 cost which should not be recovered in MEEIA”.

4 Q. What happened subsequent to the first MEEIA cycle 2 prudence review?

5 A. Prior to the filing of this rate case, on November 20, 2018, Ameren Missouri
6 filed a tariff to adjust the rate of its MEEIA Rider “EEIC Rider” Case No. ER-2019-0151, for
7 costs during the period ending December 2018 (the end of the twelve month test year period in
8 this rate proceeding). After review, it appears to Staff that a majority of the \$337,492 that has
9 been requested for recovery as part of this rate case was included in the MEEIA rider rate for
10 which the tariff was approved by the Commission and went into effect on January 25, 2019.
11 Staff issued Data Request No. 240.1 to determine if all or a portion of the \$337,492 had already
12 been sought for recovery through the MEEIA rider.

13 Q. What did Ameren Missouri’s response to Staff Data Request No. 240.1 contain?

14 A. Ameren Missouri acknowledged that the majority of the \$337,492 proposed for
15 inclusion in the cost of service is being recovered through the MEEIA rider, and a portion is no
16 longer sought for rate recovery, or was incurred outside of the test year established in this case.
17 A minor amount, specifically, certain purchasing rate expenses, remain unrecovered. Below is
18 a breakdown of the cost and associated recovery:

19

Original Proposed Adjustment	\$ 337,492	
Additional Costs	\$ (24,046)	Mis-recorded (No longer proposed for adjustment by Company)
Customer Segmentation	\$ (96,003)	Outside TY
Included in the MEEIA Rider filed in 11/2018	\$ (213,308)	Case No. ER-2019-0151
Unrecovered Balance	\$ 4,135	Purchasing Rate Expenses

20

21 Q. What is Staff’s position regarding the proposed MEEIA training and customer
22 segmentation cost inclusion?

Rebuttal Testimony of
Paul K. Amenthor

1 A. Staff proposes no adjustment to include the costs as proposed by Ameren
2 Missouri witness Laura Moore, as the majority of the costs eligible for recovery in the test year
3 were already included and are currently being recovered through the MEEIA Rider. The
4 remaining purchasing rate items in the amount of \$4,135 are overhead costs related to the
5 procurement of goods and services. Staff has requested specific detail regarding these
6 purchasing rate items in Staff Data Request No. 240.2 in order to determine if these costs have
7 already been addressed through other Staff annualizations and, if needed, will provide an update
8 on the recommended treatment of these purchasing rate items in surrebuttal testimony.

9 Q. Does this conclude your rebuttal testimony?

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

AFFIDAVIT OF PAUL K. AMENTHOR

STATE OF MISSOURI)
) ss.
ST. LOUIS COUNTY)

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

Further the Affiant sayeth not.

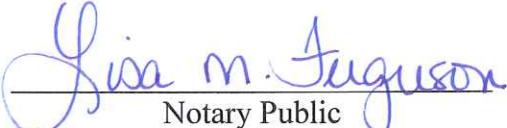


PAUL K. AMENTHOR

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for St. Louis County, State of Missouri, at my office in St. Louis, on this 20th day of January, 2020.

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