

recommendation for a free rider adjustment. In the Evaluator's final report submitted by Cadmus, the free rider adjustment is ".24."

4. The Auditor's final report has two different sections relevant to these corrections. The executive summary and the separate LightSavers section. Each of those sections provides an adjustment for the free rider estimate. Within the LightSavers section, the adjustment is ".24," the same as Ameren's evaluator. However, in the auditor's executive summary, the adjustment is ".213."

5. Throughout this case, the parties have generally agreed that the adjustments by the evaluator and the auditor are the same, but in actuality have used the different auditor number, ".213," when making calculations. Public Counsel, while consistently recommending that the Commission adopt the free ridership estimate of Ameren Missouri's evaluators, had mistakenly used the incorrect auditor adjustment within several of its calculations relating to the MWh numbers, the annual net shared benefit numbers, and performance incentive calculations. Additionally, the corrections to the testimony include changes to sections referring to the evaluator's and auditor's free rider numbers as being the same.

6. Accepting these corrections will provide the Commission with accurate calculations reflecting Public Counsel's position throughout its testimony. Accordingly, Public Counsel seeks leave of the Commission to make the following corrections:

Direct Testimony

Direct page 2 lines 19, as filed, includes the number "39%." That number is corrected to be "35.30%."

Direct page 2 lines 19, as filed, includes the number "31%." That number is corrected to be "34.70%."

Direct page 3 line 16, as filed, after the word “and,” the words “the Evaluator’s for” are added.

Direct page 4 line 10, as filed, includes the words “non participant spillover.” Those words are deleted and replaced with “the Evaluator’s non participant spillover estimates.”

Direct page 4 lines 14-16, as filed, reads “Additionally, the Auditor’s recommended participant and nonparticipant spillover estimates should be utilized to calculate the overall net-to-gross ratio for the portfolio.” The words “the Evaluator’s” are added. As corrected the sentence is ““Additionally, the Auditor’s recommended participant and the Evaluator’s nonparticipant spillover estimates should be utilized to calculate the overall net-to-gross ratio for the portfolio.”

Direct page 5 line 12, Table 1, as filed, in the row labeled OPC includes the number “86.7%.” That number is corrected to be “75.3%.”

Direct page 5 line 12, Table 1, as filed, in the row labeled OPC includes the number “300,532.” That number is corrected to be “279,959.”

Direct page 5 line 12, Table 1, as filed, in the row labeled OPC includes the number “96,967.” That number is corrected to be “117,540.”

Direct page 5 line 12, Table 1, as filed, in the row labeled OPC includes the number “37.9%” That number is corrected to be “35.30%.”

Direct page 6 line 2, Table 2, as filed, in the column labeled Net Savings Ex Post: OPC includes the number “182,160.” That number is corrected to be “168,593.”

Direct page 6 line 2, Table 2, as filed, in the column labeled Net Savings Ex Post: OPC includes the number “150%.” That number is corrected to be “139%.”

Direct page 17 line 2, as filed, includes the number “303,012.” That number is corrected to be “279,959.”

Appendix page 10 line 24, as filed, includes the number “\$1,944,127.004.” That number is corrected to “4,243,610.”

Appendix page 12 line 22, as filed, stated “No additional adjustment to free ridership is necessary.” That sentence has been corrected to say “No additional adjustment to free ridership is necessary other than to ensure that the evaluator and the auditor’s (Dimetrosky) estimate is utilized at 0.24%.”

Appendix pages 20 - 21 in table 2, as filed, the original free ridership by Cadmus/ADM for the LightSavers Program included the number “20%.” That number has been corrected to be “24%.”

Appendix pages 20 - 21 in table 2 a footnote has been added after “No Change” in the Difference column and the LightSavers row. The new footnote 10 reads “Mr. Voytas cites the wrong free ridership ratio in his testimony. 24% is what Cadmus and the auditor (Dimetrosky) agreed to.”

Appendix page 28 lines 4 - 5, as initially filed, read “I recommend that commission rely on the independent evaluators’ and auditor’s conclusion regarding this estimate.” The name “Dimetrosky” word has been added to that sentence. The sentence as corrected reads “I recommend that commission rely on the independent evaluators’ and auditor’s (Dimetrosky) conclusion regarding this estimate.”

Appendix page 61 line 14, as filed, includes the number “\$20,322,039.” That number should be corrected to be “\$129,925,000.”

Appendix page 61 line 14, as filed, includes the number “\$1,257,934.” That number should be corrected to be “\$8,042,357.”

Appendix page 62 lines 6 – 9, as filed, says “Under our scenario, and as initially proposed by Staff, Ameren would have achieved 39% of their target goal in the first year leaving them only 31% away from being eligible for a performance incentive with two additional years to reach that.” That sentence should be corrected to read “Under our scenario, Ameren would have achieved 35.30% of their target goal in the first year leaving them only 34.70% away from being eligible for a performance incentive with two additional years to reach that.”

Appendix page 64 lines 10 – 12, as filed, reads “Additionally, the Auditor’s recommended participant spillover estimates and nonparticipant spillover estimates should be utilized to calculate the overall net-to-gross ratio for the portfolio.” The word “Evaluator’s” is added. Corrected, the sentence reads “Additionally, the Auditor’s recommended participant spillover estimates and Evaluator’s nonparticipant spillover estimates should be utilized to calculate the overall net-to-gross ratio for the portfolio.”

Rebuttal Testimony

Rebuttal page 4 line 6, as filed, contains the number “300,532.” The corrected version contains the number “279,959.”

Rebuttal page 8 line 17, as filed, contains the number “300,532.” The corrected version contains the number “279,959.”

Rebuttal page 35 beginning at line 10 a sentence is added stating: “OPC has utilized the free ridership estimates calculated by Cadmus and supported by Mr. Dimetrosky’s section of the Auditor’s report.” This sentence is added to reflect that Public Counsel’s new calculations include the free ridership estimates used by Ameren Missouri’s evaluator.

Surrebuttal Testimony

Surrebuttal page 3 lines 12, Table 1, as filed, contains the number “182,160” in the Net Savings OPC column. That number is corrected to be “168,416.” In the same column row % of Target Achieved the number as filed reads “150%.” That number is corrected to be “139%.”

Surrebuttal page 3 lines 15, as filed, includes the number “150%.” That number is corrected to be “139%.”

Surrebuttal page 4 line 3, as filed, includes the number “150%.” That number is corrected to be “139%.”

Surrebuttal page 18 line 9, as filed, reads “Table 4: LightSavers NTG ratio of Evaluator and Auditor.” The words “(Dimetrosky estimate)” are added to the end of that title. As corrected the sentence reads “Table 4: LightSavers NTG ratio of Evaluator and Auditor (Dimetrosky estimate).”

Surrebuttal page 33 line 8, as filed, includes the number “9,509.” That number is corrected to be “20,097.”

Surrebuttal page 33 line 9, as filed, includes the number “68,968.” That number is corrected to be “110,534.”

Surrebuttal page 33 line 9 the words “from the evaluator’s estimate” are added after the MWh.

Surrebuttal page 33 line 9, as filed, includes the number “106,878,000.” That number is corrected to be “75,521,822.”

Surrebuttal page 33 line 10, as filed, includes the number “130%.” That number is corrected to be “100%.”

Surrebuttal page 33 line 10, as filed, includes the number “6.19%.” That number is corrected to be “5.03%.”

Surrebuttal page 33 line 13, as filed, reads “6.19% of \$23,047,000 = \$1,426,609 in overearnings.” That sentence is deleted. In its place the new sentence “5.03% of \$75,521,822 = \$3,798,747 (OPC’s position)” is inserted. After “5.03%” footnote 37 is added that reads “Represents 100% of target achieved.” An additional sentence is added that reads “6.19% of \$129,925,000 = \$8,042,357 (Joint position estimate).” After “6.19%” footnote 38 is added that reads “Represents 130+% of target achieved.”

Surrebuttal page 33 lines 14-16, as filed, includes the sentence “The calculation of the net shared benefits has been incorrectly stated because the utility cost test has been used instead of the total resource test.” The words “joint position’s” are added. As corrected the sentence reads “The calculation of the joint position’s net shared benefits has been incorrectly stated because the utility cost test has been used instead of the total resource test.”

Surrebuttal page 33 line 18, as filed, includes the word “understates.” That word is deleted and replaced with “understated.”

Surrebuttal page 33 line 18, as filed, includes the word “ratepayers.” That word is deleted and replaced with the phrase “ratepayers which are now reflected in OPC’s testimony.”

Surrebuttal page 33 lines 18-19, as filed, the word “It” is deleted and replaced with the words “Failing to account for these steps.” As corrected the sentence now reads “Failing to account for these steps also increases the likelihood that these results are to be repeated in PY2014, PY2015 and for other utilities in future MEEIA cases.”

Surrebuttal page 34 lines 18 – 19, as filed, read “Supports the methodology and calculations agreed to by both the evaluators and auditor estimates of free ridership.” The name “Dimestrosky” is added. As corrected the sentence reads “Supports the methodology and calculations agreed to by both the evaluators and auditor (Dimestrosky) estimates of free ridership.”

7. The above corrections are consistent with the recommendations made throughout Dr. Marke’s pre-filed testimony. While the MWh numbers and annual net shared benefit numbers have changed, importantly, the recommendations underlying those calculations remain the same. Attached are corrected versions of Dr. Marke’s testimony reflecting the corrections identified above.

WHEREFORE, the Office of the Public Counsel respectfully requests that the Commission will accept the foregoing corrections to the direct, rebuttal, and surrebuttal testimony of Dr. Geoff Marke.

Respectfully,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 31st day of December 2014:

/s/ Tim Opitz
