

Exhibit No.:
Issue(s): Revenue Requirement,
Including True-up
Witness: Mitchell Lansford
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: GR-2021-0241
Date Testimony Prepared: November 5, 2021

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2021-0241

SURREBUTTAL TESTIMONY

OF

MITCHELL LANSFORD

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
November 5, 2021**

SURREBUTTAL TESTIMONY

OF

MITCHELL LANSFORD

FILE NO. GR-2021-0241

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

2 A. My name is Mitchell Lansford. My business address is One Ameren Plaza,
3 1901 Chouteau Ave., St. Louis, Missouri.

4 **Q. Are you the same Mitchell Lansford that submitted direct and rebuttal**
5 **testimony in this case?**

6 A. Yes, I am.

7 **I. PURPOSE OF TESTIMONY**

8 **Q. What is the purpose of your true-up testimony in this proceeding?**

9 A. Pursuant to the Commission's *Order Setting Procedural Schedule and*
10 *Adopting Test Year* in this case, Ameren Missouri provided updated data through
11 September 30, 2021 for items to be true-up in this case.¹ The purpose of my testimony is
12 to provide the Commission with the Company's revenue requirement, as updated through
13 the true-up date of September 30, 2021 using the true-up data for those items.²

14 **Q. Do you have any schedules supporting your surrebuttal testimony?**

¹ The Company provided true-up data for each item, except for Company Owned Life Insurance investment gains and losses that no party is recommending for inclusion in the revenue requirement, listed in footnote 4 of the referenced order. True-up data was provided for additional items, as referenced in prior testimony.

² I followed the same methodology for each item being true-up as was utilized in proposing a revenue requirement value for each item in my direct testimony.

1 A. Yes. I am sponsoring Schedules MJL-S1 through MJL-S17 relating to the
2 Company's revenue requirement.³ These schedules are the same as Schedules MJL-D1
3 through MJL-D17 included with my direct testimony, except they were prepared using data
4 as of the true-up cutoff date established by the Commission in this case (September 30,
5 2021) for items being trued-up.

6 **II. TRUE-UP OF REVENUE REQUIREMENT**

7 **Q. What do Schedules MJL-S1 through MJL-S17 attached to this**
8 **testimony contain?**

9 A. Schedules MJL-S1 through MJL-S17 show each component of the
10 Company's revenue requirement, as trued-up through September 30, 2021. In my direct
11 testimony, I quantified the Company's revenue requirement using certain adjustments
12 (projections) through the true-up date, as \$9,403,000 more than the pro forma operating
13 revenues at present rates. After replacing all projected amounts with actual results through
14 the true-up date, the Company's revenue requirement is \$7,535,000 more than operating
15 revenues at present rates. Consequently, it is necessary to set rates to produce \$85,002,000
16 annually in order to provide Ameren Missouri an opportunity to collect and recover its cost
17 of service, including an opportunity to recover its cost of capital.

18 **Q. Does this conclude your surrebuttal testimony?**

19 A. Yes, it does.

³ My direct testimony also included what were labelled Schedule MJL-D13 and MJL-D18. MJL-D13 was the Depreciation Study and MJL-D18 contained cash working capital information that is not affected by the true-up.

