

753

Filed
March 24, 2015
Data Center
Missouri Public
Service Commission

Exhibit No.:	Cost of Service, Revenue
Issues:	Allocation, Rate Design
Witness:	Steve W. Chriss
Type of Exhibit:	Surrebuttal Testimony
Sponsoring Party:	Wal-Mart Stores East, LP and Sam's East, Inc.
Case No.:	ER-2014-0258
Date Testimony Prepared:	February 6, 2015

MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company, d/b/a)	
Ameren Missouri's Tariff to Increase Its Revenues)	Case No. ER-2014-0258
For Electric Service)	

SURREBUTTAL TESTIMONY OF STEVE W. CHRISS

ON BEHALF OF

WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Dated: February 6, 2015

WM Exhibit No. 753
Date 3-04-15 Reporter XF
File No. ER-2014-0258

1 **Contents**

2 Introduction 1

3 Summary of Recommendations..... 1

4 Large Transmission Service and Noranda Aluminum 2

5

1 Introduction

2 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

3 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville,
4 AR 72716-0550. I am employed by Wal-Mart Stores, Inc. as Senior Manager,
5 Energy Regulatory Analysis.

6 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?

7 A. I am testifying on behalf of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively
8 "Walmart").

9 Q. ARE YOU THE SAME STEVE W. CHRISS WHO TESTIFIED EARLIER IN THIS CASE?

10 A. Yes.

11 Q. ARE YOU SPONSORING ANY ADDITIONAL SCHEDULES WITH YOUR TESTIMONY?

12 A. No.

13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

14 A. The purpose of my testimony is to respond to the proposed Noranda wholesale
15 solution proposed by Union Electric Company d/b/a Ameren Missouri ("Ameren" or
16 "the Company").

17

18 Summary of Recommendations

19 Q. HAVE YOUR RECOMMENDATIONS CHANGED FROM YOUR EARLIER TESTIMONIES?

20 A. No.

1 Q. DO YOU HAVE ANY ADDITIONAL RECOMMENDATIONS?

2 A. Yes. Based on the testimony of other intervenors, I have the following additional
3 recommendation:

4 1) The Commission should reject Ameren's proposed wholesale solution with
5 Noranda, as will be detailed by Walmart's counsel in briefs at the appropriate
6 time.

7 The fact that an issue is not addressed herein or in related filings should
8 not be construed as an endorsement of any filed position.

9

10 **Large Transmission Service and Noranda Aluminum**

11 Q. WHAT IS YOUR UNDERSTANDING OF AMEREN'S PROPOSAL TO ADDRESS
12 NORANDA'S INITIAL PROPOSAL IN THIS CASE?

13 A. My understanding is that Ameren has proposed that the Commission release Noranda
14 from its certificate of convenience and necessity, under which Noranda takes retail
15 service from Ameren, and for Noranda to enter in to a five-year wholesale power
16 contract with Ameren. See Amended Rebuttal Testimony of Matt Michels, page 31,
17 line 12 to line 16.

18 Q. HOW WOULD OTHER CUSTOMERS BE IMPACTED BY AMEREN'S PROPOSAL?

19 A. Other customers would bear the reduction in cost to Noranda for the proposed five-
20 year term. *Id.*, page 35, line 4 to line 5. Ameren proposes to treat revenues from their
21 proposal as off-system sales revenues and would flow through those revenues to
22 other customers through the Fuel Adjustment Clause. *Id.*, line 12 to line 14.

1 Q. DOES WALMART HAVE LEGAL CONCERNS WITH AMEREN'S PROPOSAL?

2 A. Yes. However, I am not an attorney, so the legal concerns will be briefed by counsel
3 at the appropriate time.

4 Q. WHAT IS YOUR RECOMMENDATION TO THE COMISSION?

5 A. The Commission should reject Ameren's proposed wholesale solution with Noranda,
6 as will be detailed by Walmart's counsel in briefs at the appropriate time.

7 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

8 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

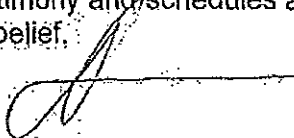
In the Matter of Union Electric Company, d/b/a)
Ameren Missouri's Tariff to Increase Its Revenues) Case No. ER-2014-0258
for Electric Service)

AFFIDAVIT OF STEVE W. CHRISS

STATE OF ARKANSAS)
) ss:
COUNTY OF BENTON)

Steve W. Chriss, being first duly sworn, deposes and states that:

1. He is employed by Wal-Mart Stores, Inc., as Senior Manager, Energy Regulatory Analysis in Bentonville, Arkansas;
2. He is the witness sponsoring the accompanying testimony entitled Surrebuttal Testimony Of Steve W. Chriss;
3. Said testimony was prepared by him and under his direction and supervision;
4. If inquiries were made as to the facts and schedules in said testimony, he would respond as therein set forth; and
5. The aforesaid testimony and testimony and schedules are true and correct to the best of his knowledge, information and belief.



Steve W. Chriss

AFFIDAVIT OF STEVE W. CHRISS,
Case No. ER-2014-0258

Subscriber and sworn to or affirmed before me this 5th day of February, 2015,
by Steve W. Chriss.

Terri D. Hall

Notary Public

My Commission No: _____

My Commission Expires: 9-28-15

(SEAL)

