

<b>Exhibit No.:</b>	
<b>Issue(s):</b>	Depreciation
<b>Witness/Type of Exhibit:</b>	Robinett/Rebuttal
<b>Sponsoring Party:</b>	Public Counsel
<b>Case No.:</b>	ER-2022-0337

**REBUTTAL TESTIMONY**

**OF**

**JOHN A. ROBINETT**

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY  
D/B/A AMEREN MISSOURI**

CASE NO. ER-2022-0337

February 15, 2023

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**REBUTTAL TESTIMONY**

**OF**

**JOHN A. ROBINETT**

**AMEREN MISSOURI  
CASE NO. ER-2022-0337**

1 **Q. What is your name and what is your business address?**

2 A. John A. Robinett, PO Box 2230, Jefferson City, Missouri 65102.

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

4 A. I am employed by the Missouri Office of the Public Counsel (“OPC”) as a Utility Engineering  
5 Specialist.

6 **Q. Have you previously provided testimony before the Missouri Public Service  
7 Commission?**

8 A. Yes. Both as a former member of Commission Staff and on behalf of the OPC.

9 **Q. What is your work and educational background?**

10 A. A copy of my work and educational experience is attached to this testimony as Schedule  
11 JAR-R-1.

12 **Q. What is the purpose of your rebuttal testimony?**

13 A. In this testimony, I discuss Ameren Missouri’s request for new depreciation rates for surge  
14 protection equipment, and for battery storage assets for generation, transmission and  
15 distribution

16 **Depreciation Rates for Surge Protection Devices**

17 **Q. What is your response to Ameren Missouri witness John J. Spanos’ recommendation  
18 of 6.80% depreciation rate residential meter surge protection devices?**

19 A. While I ultimately agree with Mr. Spanos’ recommendation for residential meter surge  
20 protection devices, I note that the supportive evidence for this recommendation is not

1 present in his testimony or attached to it. Even though the evidence has not been filed in  
2 this case it does exist. Attached as Schedule JAR-R-2C are the technical specification  
3 sheets Ameren Missouri provided in response to OPC data request 8501. I recommend the  
4 Commission approve Ameren Missouri's request for a depreciation of 6.80% for surge  
5 protection devices for residential meters which is the rate that equates to a negative 2% net  
6 salvage and 15 year average service life. The Commission may need to reconsider this  
7 depreciation rate in a future rate case if Ameren Missouri chooses to diversify the  
8 technology from several different suppliers in order to reduce the risk of relying on a single  
9 supplier. These other technologies may not have the same warranties or expected lives that  
10 the current projected assets have.

### 11 **Battery Storage Depreciation Rates**

12 **Q. What is your response to Ameren Missouri witness John J. Spanos' recommendation**  
13 **of 10.00% depreciation rate for battery storage equipment?**

14 A. Similar to my concerns above for surge protection equipment this depreciation  
15 recommendation for Ameren Missouri for battery storage depreciation rates is based on a  
16 single source. I note that the supportive evidence for this recommendation is not present in  
17 his testimony or attached to it. Even though, the evidence has not been filed in this case, it  
18 does exist. Attached as Schedule JAR-R-3C is Ameren Missouri's response to Staff data  
19 request number 0017 from Case No. EA-2019-0371 which was titled:

20 In the Matter of the Application of Union Electric Company d/b/a Ameren  
21 Missouri for Permission and Approval and a Certificate of Convenience and  
22 Necessity Authorizing it to Construct Solar Generation Facility(ies)

23 Schedule JAR-R-3C are the documents from the request for proposal that detail the  
24 battery storage technology that was to be used as part of that project.

1 **Q. Do your concerns cause you to oppose Ameren Missouri's proposed utility**  
2 **scale battery storage depreciation rates?**

3 A. No. This case is setting up depreciation rates for future assets that may or may not be placed  
4 into service before Ameren Missouri conducts its next depreciation study. In a future case  
5 Ameren Missouri may have invested in multiple battery storage solutions or the life  
6 expectancy of the technology may improve that may cause the need to adjust the current  
7 recommended service life at some point in the future.

8 **Q. What is your recommendation for utility scale battery storage depreciation rates in**  
9 **this case?**

10 A. Ultimately, I recommend the Commission approve the recommended depreciation rate of  
11 10.0% for battery storage assets.

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

13 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

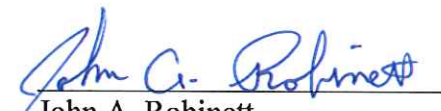
In the Matter of Union Electric Company d/b/a )  
Ameren Missouri's Tariffs to Adjust Its ) Case No. ER-2022-0337  
Revenues for Electric Service )

**AFFIDAVIT OF JOHN A. ROBINETT**

**STATE OF MISSOURI )**  
**) ss**  
**COUNTY OF COLE )**

John A. Robinett, of lawful age and being first duly sworn, deposes and states:

1. My name is John A. Robinett. I am a Utility Engineering Specialist for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
John A. Robinett  
Utility Engineering Specialist

Subscribed and sworn to me this 15<sup>th</sup> day of February 2023.



TIFFANY HILDEBRAND  
My Commission Expires  
August 8, 2023  
Cole County  
Commission #15637121

  
\_\_\_\_\_  
Tiffany Hildebrand  
Notary Public

My Commission expires August 8, 2023.