

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

**IN THE MATTER OF THE APPLICATION OF BLODGETT PAINT BALL & FUN
FACTORY, LLC, FOR THE CHANGE OF ELECTRIC SUPPLIER**

**MISSOURI PUBLIC SERVICE COMMISSION
REGULATORY REVIEW DIVISION
REBUTTAL TESTIMONY OF BRAD MILAM**

FILE NO. EO-2021-0163

Jefferson City, Missouri

May 7, 2021

REBUTTAL TESTIMONY ON BEHALF OF SEMO ELECTRIC COOPERATIVE

REBUTTAL TESTIMONY OF BRAD MILAM

Q. Please state your name and the name of your employer.

A. My name is Brad Milam. I am employed by SEMO Electric Cooperative in Sikeston, Missouri.

Q. What position do you hold with SEMO Electric Cooperative?

A. I am the Manager of IT and Engineering Services.

Q. Are you familiar with the business known as the Blodgett Paint Ball & Fun Factory, LLC?

A. Yes, SEMO previously provided electric service to a building that our records indicate was the "Fun Factory Live" and we still provide electric service to adjacent buildings.

Q. What is the name of the member listed on the account for Fun Factory Live?

A. Robert Wayne Russell.

Q. So neither Margaret nor David Russell are in any way affiliated with Fun Factory Live according to SEMO's records?

A. No they are not. I believe Robert Wayne Russell is their son and he is the only member listed on this account.

Q. Is **Exhibit A a true and accurate copy of the membership agreement for the Fun Factory Live account, which is at issue in this case, showing that the only proper account owner is Robert Wayne Russell?**

A. Yes.

Q. What other facilities does SEMO provide electric service to that, to your knowledge, are owned by Margaret or David Russell?

A. We do have another account for Robert Russell known as Blodgett Paint Ball which was established in July 2003, and is located at 3921 State Hwy H, Sikeston, MO. For David and Margaret Russell, there are two meters in their names for Camp Bended Knee which were established in November 2010, and are located at 3925 State Hwy H, Sikeston, MO.

Q. Prior to service being disconnected to the Fun Factory Live building, at the request of the member, what rate class was that facility in?

A. It started out initially as Rate 31, small commercial, because the member indicated that the monthly demand would be less than 50KW. However, because the demand exceeded 50KW twice within a 12-month period, our policy requires that account to be moved to a large commercial rate which is Rate 32. That account was in Rate 32 at the time it was disconnected.

Q. Was the member notified of this change in rate?

A. Yes a letter was sent to him.

Q. Is **Exhibit B a true and accurate copy of that letter?**

A. Yes it is.

Q. And is **Exhibit E a true and accurate copy of Rate 32 at the time that Fun Factory Live was receiving electric service from SEMO?**

A. Yes it is.

Q. What rate class are all of the other meters that are still active in Margaret or David Russells' names in?

A. The Camp Bended Knee meters are in our small commercial rate, Rate 31.

Q. Is **Exhibit F a true and accurate copy of Rate 31 as it is currently in effect?**

A. Yes.

Q. Does **Exhibit G depict a true and accurate aerial view of the Fun Factory Live facility and those facilities adjacent to it that are still served by SEMO?**

A. Yes it does.

Q. The Russells have alleged that their “church cabins” which I believe are shown in the Cooperative’s records as “Camp Bended Knee” do not currently have electric service. Is that true?

A. No. SEMO still provides electric service to two accounts at Camp Bended Knee which are the church cabins.

Q. Is Exhibit H a true and accurate copy of the most recent bills for those two accounts for the church cabins showing they are still active?

A. Yes.

Q. Is it accurate to say that all facilities depicted in Exhibit G are currently served with electricity by SEMO, with active meters and monthly bills for usage being sent out, except for the largest building known as “Fun Factory Live”?

A. Yes.

Q. Can you explain how monthly bills are calculated under Rate 32, depicted on Exhibit E, are calculated?

A. The use of instrument rated metering is deployed when the service energy demand or voltage requirements exceed conventional self-contained meter designs. Instrument rated metering use Current Transformers (CT) to reduce the current to a safe measurable ratio and also may use Voltage/Potential Transformers (VT/PT) to reduce the voltage to a safe measurable ratio of the primary service delivered to a consumer. These ratios are known as the multiplier. An instrument rated meter measures and records these readings as any revenue meter would and is read monthly as any revenue meter would, the actual usage for the service is determined by these readings multiplied by the product of CT turns ratio and VT ratio. In this particular service metering configuration, voltage transformers were not needed so the multiplier is solely determined by the current transformer ratio of 200:5 or 200 divided by 5 giving a 40 multiplier. This simply means that if the consumer is using 100 amps at the service location, the meter is recording 2.5 amps. Current use over time at a nominal voltage is called energy, the amount of energy used is measured in magnitude or demand and volume or kilowatt hours.

SEMO Electric Cooperative’s 2020 rate classifications show, for a Large Commercial account with demand over 50 kW (Kilowatts), the average 15 minute peak demand of the service will be used to determine charges at a rate of \$9.00 per kilowatt of peak demand. For instance, this service set a peak demand between the dates of March 25, 2020 and April 27, 2020 of 7.48 kW using the rate of \$9.00 per kW was charged \$67.32 for demand on the April 2020 bill.

The adjustments are due to underpayment and overpayment by the member.

Q. And is that the way that all members' bills who are subject to Rate 32 are calculated?

A. Yes. The accounts that are under that rate class are all calculated the same way.

Q. To your knowledge, were any complaints ever received by SEMO regarding "service issues" at the Fun Factory Live location?

A. No. Our records indicate that all complaints on this account were regarding what the member perceived as a high bill. There were no complaints made regarding anything other than rates and bills.

Q. To your knowledge, were any complaints ever received by SEMO regarding "slow response times" at the Fun Factory Live location?

A. No. Our outage records for that location indicate that for the past three years there were only infrequent and unavoidable outages beyond the control of SEMO which are consistent with industry standards.

Q. Do you know what the members may be referencing with regard to "slow response times"?

A. No, I don't know what that would be regarding. Our outage records for that location indicate that for the past three years there were only infrequent and unavoidable outages beyond the control of SEMO which are consistent with industry standards.

Q. Does Exhibit C fairly and accurately reflect SEMO's outages for the Fun Factory Live location as they are ordinarily kept in the normal course of business?

A. Yes.

Q. What complaints did the member make regarding rates and bills regarding the Fun Factory Live location?

A. On January 16, 2019, a SEMO representative spoke with Mr. Russell regarding a high bill complaint.

Q. Did SEMO do anything in regard to this complaint?

A. Yes, a SEMO representative put a recording volt meter (RVM) at the site and then reviewed the power usage results and bills with Mr. Russell on February 4, 2019.

Q. Does Exhibit D fairly and accurately reflect the record of that complaint and the follow up that SEMO did as it was recorded by SEMO and maintained in the usual course of business?

A. Yes.

Q. And what were the results of that test?

A. That the usage reflected on the meter and bills was accurate and was due to the large building being heated and cooled by all-electric HVAC units. The test results showed that usage peaked when the HVAC units kicked on.

Q. Did SEMO offer any sort of help or advice to the member as far as what they could do to remedy their high usage?

A. Yes. SEMO's engineer told the member they could have an electrician divide the HVAC units into two separate meters in order to better control their load and usage. That would have also put them in a rate class that doesn't have a demand component.

Q. To your knowledge, has the member requested SEMO to add another meter to the Fun Factory Live location so that they can split their HVAC load?

A. No they have not.


Q. If the member hired an electrician to split the HVAC load and then requested SEMO to add an additional meter to the Fun Factory Live building, would SEMO do so?

A. Yes, SEMO would do so in a manner that complied with its policies.

Q. If a second meter was added to the Fun Factory Live building, would both meters at that location be put into a different rate class?

A. Yes, as long as the existing load was split evenly between both meters, and nothing else was added, they would both be put into Rate 31 as shown in Exhibit F because the load would then be under 50 kW per meter. The previous 12 month peak demand for the Fun Factory Live building was 86,400 kW prior to disconnection.

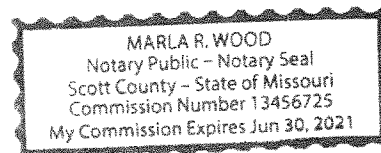
Brad Milam on his oath declares that he is of sound mind and lawful age; that he contributed to his direct testimony; and that his direct testimony is true and correct to the best of his knowledge and belief.


Brad Milam

State of Missouri)
) ss.
County of Scott)

Subscribed and sworn before me this 24th day of May, 2021.


Notary Public



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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the above and foregoing Direct Testimony of Brad Milam was served by electronic mail, this 7th day of May, 2021 upon the following:

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