

Exhibit No.:  
Issues: Load Forecast  
Witness: David C. Roos  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
File No.: EO-2011-0271  
Date Testimony Prepared: October 28, 2011

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**DAVID C. ROOS**

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

**FILE NO. EO-2011-0271**

*Jefferson City, Missouri  
October 2011*

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


In the Matter of Union Electric Company's )  
2011 Utility Resource Filing Pursuant to )  
4 CSR 240 - Chapter 22 )

File No. EO-2011-0271

**AFFIDAVIT OF DAVID C. ROOS**

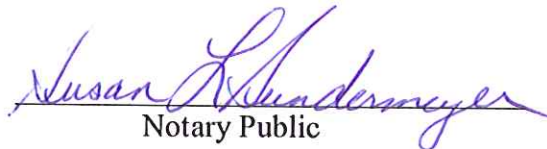
STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE     )

David C. Roos, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 2 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
David C. Roos

Subscribed and sworn to before me this 27<sup>th</sup> day of October, 2011.

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086
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Notary Public

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **DAVID C. ROOS**

4 **UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

5 **FILE NO. EO-2011-0271**

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12 Q. Please state your name and business address.

13 A. My name is David C. Roos, and my business address is Missouri Public  
14 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

15 Q. What is your present position at the Missouri Public Service Commission?

16 A. I am a Regulatory Economist in the Energy Unit of the Regulatory Review  
17 Division.

18 Q. Are you the same David C. Roos that contributed to Staff’s Report on Electric  
19 Utility Resource Planning Compliance Filing filed on June 23, 2011, in this case?

20 A. Yes, I am.

21 Q. Would you please summarize the purpose of your rebuttal testimony?

22 A. I address certain responses of Union Electric Company d/b/a Ameren Missouri  
23 (“Ameren Missouri” or “Company”) to alleged deficiencies and concerns filed on September  
24 15, 2011, related to the Load Forecast in Ameren Missouri’s 2011 Integrated Resource Plan.

25 Q. Missouri Department of Natural Resource’s (“DNR”) Deficiency 1 states that  
26 Ameren Missouri’s Load Forecast is deficient, because it does not take in account new  
27 economic data available from Moody’s. Does Staff agree with this allegation by DNR?

28 A. No. While Staff’s position is that the best available data should be used for  
29 load analysis and forecasting, commercially available economic databases are routinely

Rebuttal Testimony of  
David C. Roos

1 updated and new data releases can create timing issues for completing all steps of the resource  
2 planning process on time. It is Staff's position that the Company used adequately current  
3 economic data to complete the planning process in a timely manner.

4 Q. Will Ameren Missouri have an opportunity to revise its long-term forecasts  
5 based on new data?

6 A. Yes. Most impacts of new economic data releases can be reviewed by the  
7 Company and stakeholders through the resource planning annual update stakeholder meetings  
8 and report filing process. New economic data releases should not cause a rework of the  
9 triennial compliance filing.

10 Q. DNR's Deficiencies 1 and 2 state that some of Ameren Missouri's forecast  
11 variables (driver and end-use variables) are dubious or suspect. Does Staff agree?

12 A. No. Staff's review of Ameren Missouri's forecasts found no deficiencies or  
13 concerns with the selection or development of the variables used to develop the forecasts. It  
14 is Staff's position that Ameren Missouri has provided a reasonable description of a valid  
15 process that Ameren Missouri used for selecting and developing its load forecasting variables.  
16 By their nature, forecasts contain assumptions and uncertainties that often require further  
17 consideration and discussion. Missouri's resource planning rules require the development of  
18 high-, base- and low-case forecasts that are used for integrated resource analysis, risk analysis  
19 and strategy selection. This gives the utility's decision makers the opportunity to assess the  
20 impact that load uncertainty has on the preferred resource plan.

21 Q. Does this conclude your rebuttal testimony?

22 A. Yes.