

Exhibit No.:
Issues: *Fuel Adjustment Clause*
Witness: *Dana E. Eaves*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case Nos.: *ER-2019-0335*
Date Testimony Prepared: *January 21, 2020*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

DANA E. EAVES

UNION ELECTRIC COMPANY

D/B/A Ameren Missouri

CASE NO. ER-2019-0335

Jefferson City, Missouri
January 2020

1 A. Ameren Missouri's witness Marci Altoff's direct testimony provides exemplar
2 Rider FAC tariff sheets. Ameren Missouri proposes the following revisions to the amount of
3 transmission costs to be included as purchased power on its Sheet 71.3:

4 (1) One hundred percent (100%) of transmission service costs
5 reflected in FERC Account 565 to either:

6 a. transmit excess electric power sold to third parties to locations
7 outside of MISO (off-system sales) (excluding costs or revenues under
8 MISO Schedule 10, or any successor to that MISO Schedule) or;

9 b. transmit electric power on a non-MISO system.

10 Staff is opposed to this language, because it is vague and confusing. In Ameren Missouri's
11 response to Staff's Data Request No. 0383, Mark J. Peters states;

12 Ameren Missouri has recognized that the proposed language in
13 Rider FAC for factor T, requires modification to avoid potential
14 confusion regarding charges recorded to account 565 for transmission
15 charges received from AECI and KCP&L for firm network service to
16 serve Ameren Missouri load under the respective interchange
17 agreements.

18 The Company would propose modifying this section to read
19 (edits in *bold italics*):

20 *1) One hundred percent of transmission service costs reflected
21 in FERC Account 565 to either:

22 a. transmit excess electric power sold to third parties to locations
23 outside of MISO (off-system sales)(excluding costs or revenues under
24 MISO Schedule 10, or any successor to that MISO Schedule) or;

25 b. transmit electric power on a non-MISO system (*excluding*
26 *those amounts associated with that portion of the Company's native*
27 *load which is connected to a non-MISO system under a borderline,*
28 *interchange or similar agreement*),

29 **2) One and 65/100 percent (1.65%) of transmission service
30 costs reflected in FERC Account 565 directly attributable to Ameren
31 Missouri's network transmission service (*including those amounts*
32 *associated with that portion of the Company's native load which is*
33 *connected to a non-MISO system under a borderline, interchange or*
34 *similar agreement, and* excluding (a) amounts associated with portions
35 of Purchased Power Agreements dedicated to specific customers under
36 the Renewable Choice Program tariff and (b) costs or revenues under
37 MISO Schedule 10, or any successor to that MISO Schedule), and

38 *3) One and 65/100 percent (1.65%) of transmission revenues
39 reflected in FERC Account 456.1(excluding costs or revenues under
40 MISO Schedule 10, or any successor to that MISO Schedule).

1 This response does not provide enough specificity, even with the proposed clarifying language,
2 to give Staff a clear understanding of the actual impact this proposed change would have on the
3 Rider FAC in the future. Staff is also concerned that this proposed language may be
4 substantially impacted by new generation facilities that are built and operated outside of the
5 MISO control area in the future.

6 Q. Has Ameren Missouri provided information that there are future generation
7 facilities being constructed that will be constructed outside of MISO and Ameren Missouri
8 service territory?

9 A. Yes. In Case No. EA-2019-0181 Ameren Missouri is proposing to construct a
10 299 MW wind generation facility known as the Outlaw Wind Facility located in Northwest
11 Missouri.

12 Q. Does Ameren Missouri provide for the possibility that the Outlaw Wind Facility
13 will be in constructed in the Southwest Power Pool (“SPP”) control area?

14 A. Yes. In his response to Staff’s Data Request No. 0039¹ in Case No.
15 EA-2019-0181, Ameren Missouri’s witness Andrew Meyer confirms that this could occur:

16 If the generator is connected and registered in SPP, there is no intention
17 to utilize the generator for capacity compliance purposes in the MISO.
18 SPP does not have a functional capacity market, nor does Ameren
19 Missouri currently have demand obligations in SPP. Therefore, if
20 connected and registered in SPP, there should be no modeled capacity
21 value, and Ameren Missouri has not included any capacity value in its
22 economic modeling of the project in SPP.

23 Staff opines that Commission approval of Ameren Missouri’s proposed tariff change (inclusion
24 of 100% of transmission costs for non-MISO generation facilities) would allow for transmission

¹ In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Under 4 CSR 240-3.105, File No. EA-2019-0181, attached in its entirety as Schedule DEE-r3.

1 costs associated with this wind project to be recovered from Ameren Missouri's customers yet
2 provide no capacity or energy benefits, as Mr. Meyer stated. Allowing transmission costs
3 created by these facilities to be recovered through the FAC could place a burden on Ameren
4 customers to transmit energy that was never intended to serve Ameren Missouri customer load
5 and could shift the risk of transmission costs from customers of other SPP load serving entities
6 to Ameren Missouri customers. Therefore, allowing transmission costs created by these
7 facilities to be recovered through Ameren Missouri's FAC would be inappropriate.

8 Q. Did Staff also attempt to identify the specific nature of costs that the proposed
9 tariff language would allow to be recovered through the Rider FAC?

10 A. Yes. Ameren Missouri provided its response to Staff's Data Request No. 0365
11 in this case:

12 **QUESTION**

13 Please provide details of all general ledger amounts, including minor
14 account and resource type, to support costs in FERC account 565 for
15 transmission of excess electric power sold to third parties to locations
16 outside of MISO or to transmit electric power on a non-MISO system,
17 for the test year period of 12 months ending December 31, 2018. DR
18 requested by Lisa Wildhaber (lisa.wildhaber@psc.mo.gov).

19 **RESPONSE**

Prepared By: Neil Graser

Title: Manager, Power & Fuels Accounting

Date: October 23, 2019

20 Note that actual amounts recorded in the general ledger during the test
21 year are not able to be identified for transmission sold to third parties
22 to locations outside of MISO or on a non-MISO system. Please refer
23 to the Direct Testimony of Ameren Missouri witness Andrew Meyer
24 (page 4, lines 11-21) which provides a narrative of the methodology used
25 to establish the transmission service costs for the test year. Additionally
26 please see the Company's response to MPSC 0383 for additional
27 consideration.

1 Q. Is it important for the Company to be able to specify the unique costs and
2 revenues for all FAC accounts?

3 A. Yes. It is fundamentally imperative for Ameren Missouri to be able to provide
4 this information to Staff and all interested parties during FAC prudence reviews and other
5 filings. Due to the uncertainty of the proposed language and Ameren Missouri's inability to
6 track these costs in its general ledger, Staff does not agree with the inclusion of Ameren
7 Missouri's proposed language related to this issue.

8 Q. Does this conclude your rebuttal testimony?

9 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

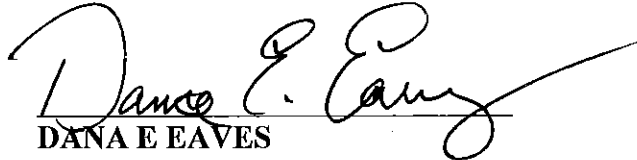
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Decrease)
Its Revenues for Electric Service) Case No. ER-2019-0335

AFFIDAVIT OF DANA E. EAVES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW DANA E. EAVES and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Dana E. Eaves*; and that the same is true and correct according to his best knowledge and belief.

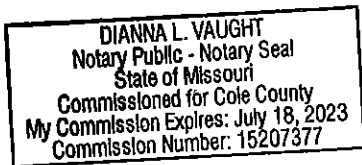
Further the Affiant sayeth not.

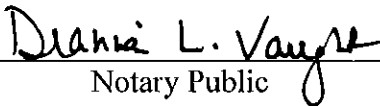


DANA E EAVES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of January, 2020.





Notary Public

CASE PROCEEDING PARTICIPATION

DANA E. EAVES

PARTICIPATION		TESTIMONY
COMPANY	CASE NO.	ISSUES
KCPL	EO-2019-0068	FAC Prudence Review
GMO	EO-2019-0067	FAC Prudence Review
GMO	EO-2018-0364	MEEIA Prudence Review
KCPL	EO-2018-0363	MEEIA Prudence Review
GMO	EO-2018-0299	MEEIA Cycle 3 Application
KCPL	EO-2018-0298	MEEIA Cycle 3 Application
Empire District Electric Company	EO-2018-0244	MEEIA Prudence Review
KCPL	ER-2018-0145	Risk Management
KCP&L GMO	ER-2018-0146	Risk Management
Ameren Missouri	EO-2018-0155	MEEIA Prudence Review
Ameren Missouri	EO-2018-0067	FAC Prudence Review
KCP&L GMO	EO-2017-0232	Hedging
KCP&L	EO-2017-0231	Hedging
Osage Water Company Camden County Circuit Court	APCV102627CC	Legal Fees
Empire District Electric Company	EO-2017-0065	Risk Management/Hedging
Ameren Missouri	ER-2016-0179	Fuel Adjustment Clause
KCP&L GMO	ER-2016-0156	Fuel Adjustment Clause
KCP&L	EO-2016-0183	MEEIA Prudence Review
KCPL GMO	EO-2015-0180	MEEIA Prudence Review Program costs and TD-NSB Share, Software system costs, Contractors, Interest Costs

PARTICIPATION		TESTIMONY
COMPANY	CASE NO.	ISSUES
Ameren Missouri	EO-2015-0029	MEEIA Prudence Review Program costs and TD-NSB Share, Software system costs, Contractors, Interest Costs
Empire District Electric Company	EO-2014-0057	FAC Prudence Review Risk Management
AmerenUE	EO-2013-0407	FAC Prudence Review Risk Management
KCP&L Greater Missouri Operations (GMO)	EO-2013-0325	FAC Prudence Review Purchased Power Agreements & Costs, Hourly weighted Transfer Pricing, Off- system sales revenue
Empire District Electric Company	EO-2013-0114	FAC Prudence Review Financial Hedges, Off-system sales revenue
Ameren Missouri	EO-2012-0074	FAC Prudence Review Direct/Rebuttal Requirements Contracts
KCP&L Greater Missouri Operations (GMO)	EO-2011-0390	FAC Prudence Review Direct/Rebuttal Hedging Purchased Power
Empire District Electric Company	EO-2011-0285	FAC Prudence Review FAC Components
AmerenUE	EO-2010-0255	FAC Prudence Review Direct/Rebuttal Requirements Contracts
Empire District Electric Company	EO-2010-0084	FAC Prudence Review Fuel Cost, Off-System Sales, Interest Cost

PARTICIPATION		TESTIMONY
COMPANY	CASE NO.	ISSUES
Missouri American Water Company	WR-2008-0311	Surrebuttal; Pension and Other Post-Retirement Employee Benefits Costs, Annual Incentive Plan Pay-out Based Upon Meeting Financial Goals and Customer Satisfaction Survey, Labor and Labor-Related Expenses, Rate Case Expenses, Insurance Other than Group, and Waste Disposal Expense
Empire District Electric Company	ER-2008-0093	Fuel and Purchased Power, Fuel Inventories, FAS 87 (pension), FAS 106 (OPEBS), Expenses and Regulatory Assets, Off System Sales, Transmission Revenue, SO2 Allowances, Maintenance Expense
Laclede Gas Company	GR-2007-0208	Accounting Schedules Reconciliation
Aquila, Inc d/b/a Aquila Networks-MPS & L&P	ER-2007-0004	Payroll Expense, Payroll Taxes and Employee Benefits
Empire District Electric Company	ER-2006-0315	Direct - Jurisdictional Allocations Factors, Revenue, Uncollectible Expense, Pensions, Prepaid Pension Asset, Other Post-Employment Benefits Rebuttal - Updated: Pension Expense, Updated Prepaid Pension Asset, OPEB's Tracker, Minimum Pension Liability
Missouri Gas Energy (Gas)	GR-2004-0209	Direct – Cash Working Capital, Payroll, Payroll Taxes, Incentive Compensation, Bonuses, Materials and Supplies, Customer Deposits and Interest, Customer Advances and Employee Benefits Surrebuttal – Incentive Compensation
Aquila, Inc. d/b/a Aquila Networks-MPS & L&P (Natural Gas)	GR-2004-0072	Direct - Payroll Expense, Employee Benefits, Payroll Taxes Rebuttal – Payroll Expense, Incentive Compensation, Employer Health, Dental and Vision Expense

PARTICIPATION		TESTIMONY
COMPANY	CASE NO.	ISSUES
Aquila, Inc. d/b/a Aquila Networks-MPS (Electric)	ER-2004-0034	Direct - Payroll Expense, Employee Benefits, Payroll Taxes Rebuttal – Payroll Expense, Incentive Compensation, Employer Health, Dental and Vision Expense
Aquila, Inc. d/b/a Aquila Networks-L&P (Electric & Steam)	HR-2004-0024	Direct - Payroll Expense, Employee Benefits, Payroll Taxes
Osage Water Company	ST-2003-0562 WT-2003-0563	Direct - Plant Adjustment, Operating & Maintenance Expense Adjustments
Empire District Electric Company	ER-2002-0424	Direct - Cash Working Capital, Property Tax, Tree Trimming, Injuries and Damages, Outside Services, Misc. Adjustments
Citizens Electric Corporation	ER-2002-0297	Direct - Depreciation Expense, Accumulated Depreciation, Customer Deposits, Material & Supplies, Prepayments, Property Tax, Plant in Service, Customer Advances in Aid of Construction
UtiliCorp United Inc, d/b/a Missouri Public Service	ER-2001-672	Direct - Advertising, Customer Advances, Customer Deposits, Customer Deposit Interest Expense, Dues and Donations, Material and Supply, Prepayments, PSC Assessment, Rate Case Expense

PARTICIPATION –NON-Case (Informal) proceeding		
COMPANY	CASE or Tracking No.	ISSUES
RDG Sanitation	SA-2010-0096	Certificate Case
Mid Mo Sanitation	SR-2009-0153	Informal General Rate Case

PARTICIPATION –NON-Case (Informal) proceeding		
COMPANY	CASE or Tracking No.	ISSUES
Highway H Utilities, Inc.	SR-2009-0392 and WR-2009-0393	Informal General Rate Case Lead Auditor
Osage Water Company	SR-2009-0149 WR-2009-0152	General Rate Case Lead Auditor
Hickory Hills	SR-2009-0151 WR-2009-0154	General Rate Case Lead Auditor
Missouri Utilities	SR-2009-0153 WR-2009-0150	General Rate Case Lead Auditor
Roy L. Utilities	QS-2008-0001 and QW-2008-0002	General Informal Rate Case Lead Auditor
IH Utilities, Inc.	QW-2007-0003	General Rate Case Lead Auditor
W.P.C. Sewer Company	QS-2007-0005	Rate Case Lead Auditor
West 16 th Street Sewer Company, Inc.	QS-2007-0004	Rate Case Lead Auditor
Gladlo Water & Sewer Company, Inc.	QS-2007-0001 and QW-2007-0002	Rate Case Lead Auditor Supervised: Kofi Boateng
Taneycomo Highlands, Inc.	QS-2006-0004	Rate Case Lead Auditor
Empire District Electric	QW-2005-0013	Informal General Rate Case
Cass County Telephone Company	TO-2005-0237	Cash Flow Analysis, LEC Invoices, Bank Reconciliations, Expense Analysis

PARTICIPATION –NON-Case (Informal) proceeding		
COMPANY	CASE or Tracking No.	ISSUES
LTA Water Company	WM-2005-0058	Merger Case with Missouri American Main Issue: Plant Valuation Lead Auditor
Noel Water Company, Inc.	QW-2005-0002	Rate Case Lead Auditor Supervised: Kofi Boateng
Suburban Water and Sewer Company, Inc.	QW-2005-0001	Rate Case Lead Auditor Supervised: Kofi Boateng
Osage Water Company	WC-2003-0134	Customer Refund Review
Noel Water Company, Inc.	QW-2003-0022	Rate Case Lead Auditor Supervised: Trisha Miller
AquaSource	WR-2003-0001 and SR-2003-0002	Plant in Service, Construction Work in Progress, Payroll, Depreciation Expense
Warren County Water and Sewer Company	WC-2002-155	Pump Repair/replacement, Revenue, Salary
Environmental Utilities, LLC	WA-2002-65	Certificate Case
Meadows Water Company	WR-2001-966 and SR-2001-967	Expense Items

DANA EAVES

CAREER EXPERIENCE

Missouri Public Service Commission, Jefferson City, Missouri

Utility Regulatory Auditor V May 17, 2017 – Present

Utility Regulatory Auditor IV January 1, 2013 – May 17, 2017

Utility Regulatory Auditor III April 23, 2003– December 31, 2012

Utility Regulatory Auditor II April, 2002 – April, 2003

Utility Regulatory Auditor I April, 2001 – April, 2002

Perform rate audits and prepare miscellaneous filings as ordered by the Commission. Review all exhibits and testimony on assigned issues from the most recent previous case and the current case. Develop accounting adjustments and issue positions which are supported by workpapers and written testimony. Prepare Staff Recommendation Memorandum for filings that do not require prepared testimony. As a Utility Regulatory Auditor V, in the Energy Resource Analysis Department, I am the lead Auditor for Fuel Adjustment Clause Prudence Reviews and Missouri Energy Efficiency Investment Act Prudence Reviews and perform other tasks as assigned by management. I have testified under cross-examination as an expert witness for litigated rate cases.

Midwest Block and Brick, Jefferson City, Missouri

Accountant December 2000 – March 2001

CIS/Accounting Assistant July 2000 – December 2000

Practice Management Plus, Inc., Jefferson City, Missouri

Vice President Operations October 1998 – May 2000

Capital City Medical Associates (CCMA), Jefferson City, Missouri

Director of Finance March, 1995-October, 1998

ADDITIONAL EXPERIENCE

Wright Camera Shop/Sales	1987-1995
Movies To Go, Inc/Store Manager	1984-1987
Butler Shoe Corp./Store Manager	1982-1984
Southeastern Illinois College/Student	1979-1982
Kassabaum's Bicycle Shop/Store Manager	1977-1979

EDUCATION

Bachelor of Science, Business Administration; Emphasis Accounting (1995)
COLUMBIA COLLEGE, JEFFERSON CITY, MO

Ameren Missouri's
Response to MPSC Data Request - MPSC
EA-2019-0181
Application for Wind CCN - Outlaw

No.: MPSC 0039

In Mr. Michels' Direct testimony (Michels Direct Pg 7 lines 14-16) he states "Capacity revenues, where applicable (i.e., in the MISO connection cases), are determined by applying a range of capacity price estimates to the expected capacity credit for the wind generation." 1. Please clarify whether Ameren Missouri intends the Outlaw Wind project (the Project) to be used to satisfy Ameren Missouri's MISO capacity requirements under the following scenarios: a. Does Ameren Missouri intend the Outlaw Wind project to be used to satisfy Ameren Missouri's MISO capacity requirements in its first five (5) years of useful life if it is interconnected into MISO? b. During the Project's useful life if it is interconnected into MISO? c. In its first five (5) years of useful life if it is interconnected into SPP? d. During the Project's useful life if it is interconnected into SPP? 2. Please clarify whether Ameren Missouri intends for energy from the Outlaw Wind project (the Project) to be used to offset Ameren Missouri's load in the MISO integrated marketplace under the following scenarios: a. Does Ameren Missouri intend for energy from the Outlaw Wind project to be used to offset Ameren Missouri's load in the MISO integrated marketplace in its first five (5) years of useful life if it is interconnected into MISO? b. During the Project's useful life if it is interconnected into MISO? c. In its first five (5) years of useful life if it is interconnected into SPP? d. During the Project's useful life if it is interconnected into SPP? 3. Please clarify whether Ameren Missouri intends to offer the Outlaw Wind project (the Project) as capacity to an SPP market participant under the following scenarios: a. Does Ameren Missouri intend to offer the Outlaw Wind project as capacity to an SPP market participant in its first five (5) years of useful life if it is interconnected into MISO? b. During the Project's useful life if it is interconnected into MISO? c. In its first five (5) years of useful life if it is interconnected into SPP? d. During the Project's useful life if it is interconnected into SPP? 4. Please clarify whether Ameren Missouri intends to operate the Outlaw Wind project (the Project) as essentially an independent power producer under the following scenarios, supplying any additional clarification as to intended operation for each scenario: a. Does Ameren Missouri intend to operate the Outlaw Wind project as essentially an independent power producer in first five (5) years of useful life if it is interconnected into MISO? b. During the Project's useful life if it is interconnected into MISO? c. In its first five (5) years of useful life if it is interconnected into SPP? d. During the Project's useful life if it is interconnected into SPP? 5. Please clarify the transmission and market arrangements Ameren Missouri intends for the Outlaw Wind project (the Project) (pseudo ties, firm transmission, etc) under the following scenarios, supplying any additional clarification as to intended operation for each scenario: a. In its first five (5) years of useful life if it is interconnected into MISO? b. During the Project's useful life if it is

interconnected into MISO? c. In its first five (5) years of useful life if it is interconnected into SPP? d. During the Project's useful life if it is interconnected into SPP? DR submitted by Shawn Lange (shawn.lange@psc.mo.gov).

RESPONSE

Prepared By: Andrew Meyer

Title: Sr. Director Energy Management & Trading

Date: 06/25/2019

5a/b/c/d.

Per the 06/24/19 discussion with Shawn Lange, the Outlaw wind project may potentially interconnect, and therefore become a registered generation asset, in either MISO or SPP. If connected to SPP, Ameren Missouri does not intend to pseudo-tie the generator into MISO, nor does it intend to schedule the energy from the generator into MISO by any other means. Ameren Missouri does not anticipate any transmission reservation charges in either MISO or SPP.

1a/b/c/d.

If the generator is connected and registered in the MISO, it is Ameren Missouri's expectation that it will be utilized to satisfy MISO capacity requirements in the first five years and throughout its useful life. If the generator is connected and registered in SPP, there is no intention to utilize the generator for capacity compliance purposes in the MISO. SPP does not have a functional capacity market, nor does Ameren Missouri currently have demand obligations in SPP. Therefore, if connected and registered in SPP, there should be no modeled capacity value, and Ameren Missouri has not included any capacity value in its economic modeling of the project in SPP.

3a/b/c/d.

Ameren Missouri does not intend to market the capacity from the Outlaw wind project to other market participants.

2a/b/c/d.

Regarding energy, both MISO and SPP operate nodal energy markets. Market participants are required to buy all energy for load obligations and sell all energy from generation resources. Within the MISO, the locational marginal prices (LMPs) received by Ameren Missouri generators are not necessarily equal to the LMPs paid by Ameren Missouri's load. To the extent that any Ameren Missouri generator serves to "offset Ameren Missouri load," it is as a source of revenue to offset the load expense. This generation and load hedge arrangement for the Outlaw wind farm will also be true regardless of whether the Outlaw wind farm is registered in either MISO or SPP.

4a/b/c/d.

See response to 2a/b/c/d.

Please see the Company's response to MPSC 0040 for additional information regarding modeling assumptions consistent with the above characterization of Ameren Missouri's expected operation of the project in wholesale markets.