Exhibit No.:

Issues: Adjustment to FAC Rate -

Twenty-Second Accumulation

Period

Witness: Erik C. Wenberg
Sponsoring Party: Union Electric Co.
Type of Exhibit: Direct Testimony

Case No.: ER-2016-___

Date Testimony Prepared: July 25, 2016

MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

ERIK C. WENBERG

July, 2016 St. Louis, Missouri

DIRECT TESTIMONY

OF

ERIK C. WENBERG

Case No. ER-2016-____

1	Q:	Please state your name and business address.
2	A:	My name is Erik C. Wenberg. My business address is One Ameren Plaza, 1901
3		Chouteau Ave., St. Louis, Missouri.
4	Q:	By whom and in what capacity are you employed?
5	A:	I am employed by Ameren Services Company ("Ameren Services") as Director,
6		Wholesale Power and Fuel Accounting. Ameren Services provides various corporate
7		support services to Union Electric Company d/b/a Ameren Missouri ("Company" or
8		"Ameren Missouri"), including settlement and accounting related to fuel, purchased
9		power and off-system sales.
10	Q:	What is the purpose of your testimony?
11	A:	My testimony supports the 4th Revised Sheet No. 73.11 of Ameren Missouri's Schedule
12		No. 6 – Schedule of Rates for Electric Service, that is being filed by Ameren Missouri to
13		adjust customer rates for changes in Ameren Missouri's fuel and purchased power costs,
14		net off-system sales revenues, and associated transportation (i.e., Actual Net Energy
15		Costs, or "ANEC"), which were experienced during the four-month period February
16		2016 through May 2016. 1

¹ This four-month period is the twenty-second overall Accumulation Period under Ameren Missouri's Rider FAC, which was first approved by the Commission in Case No. ER-2008-0318, and which has subsequently been re-

Q:	Please explain why Ameren Missouri is filing a revision to its Rider FAC at this
	time.

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A: The Commission's rule governing fuel and purchased power cost recovery mechanisms for electric utilities – specifically 4 CSR 240-20.090(4) – and Ameren Missouri's Rider FAC, require Ameren Missouri to make periodic filings to adjust customer rates for changes in Ameren Missouri's ANEC experienced during each Accumulation Period as compared to the base level of net energy costs (Factor "B" as listed in the Company's Rider FAC tariff) applicable to that same Accumulation Period. That change is to then be reflected in an adjustment to the Rider FAC Fuel Adjustment Rate (i.e., Factor "FAR" in Rider FAC). This adjustment can be positive (a FAR of greater than zero) or negative (a FAR of less than zero). The Commission's rule requires at least one such review and adjustment each year. Ameren Missouri's approved FAC tariff calls for three filings annually – one filing covering each of the three four-month Accumulation Periods reflected in Rider FAC. The changes in the FAR implemented in these three filings are then collected from or refunded to customers over the applicable Recovery Period. The Recovery Period applicable to this filing will consist of the billing months of October 2016 through May 2017.

Q. What adjustment is being made in this filing?

A. Ameren Missouri's ANEC during the February 1, 2016 to May 31, 2016 Accumulation

Period increased by \$12,876,430 as compared to the Factor "B" applicable to that period.

The primary factor driving this increase above the base (Factor "B") was lower off
system sales margins, partially off-set by higher net capacity revenues. Also included in

authorized, with certain modifications, in Case Nos. ER-2010-0036, ER-2011-0028, ER-2012-0166 and ER-2014-0258.

this filing is the true-up amount reflected in the Company's nineteenth true-up filing, which is being filed concurrently with the initiation of this docket. The above results in a Fuel and Purchased Power Adjustment (FPA) of \$12,167,637 which, as described further below, will produce the FAR rates that will appear as a separate line item to be applied to customers' bills during the 22nd Recovery Period that starts with the first day of the October, 2016 billing month.

Q: Please further describe the impact of the change in the FAR on the Company's

customers.

A:

The \$12,876,430 increase in ANEC as compared to Factor "B" was calculated in the manner specified in the Company's Rider FAC, and adjusted for voltage level differences, as provided for in Rider FAC. Applying the 95% sharing ratio, the amount referenced above of -\$536,023 from the nineteenth true-up filing (made concurrently with the initiation of this docket) and the applicable recovery of interest totaling \$471,052 as provided for in Rider FAC (which includes the recovery of \$10,640 in interest for the current Accumulation Period and the recovery of \$460,412 in interest for the true-up of Accumulation Period 19), the total adjustment to be reflected in the FAR is \$12,167,637. That total, when using the estimated kWh sales for the October 2016 to May 2017 Recovery Period, results in an Initial Rate Component to be applied to the Company's Individual Service Classifications. As provided for in Rider FAC, to the extent the Industrial Aluminum Smelter Service Classification Initial Rate Component exceeds \$0.002/kWh, the difference is applied to the remaining Individual Service Classifications to arrive at the FAR amounts that will be billed during the applicable Recovery Period.

As the Industrial Aluminum Smelter Service Classification Initial Rate Component for the subject Accumulation Period did not exceed \$0.002/kWh, there was no difference to be applied to the remaining Individual Service Classifications. The following are the FAR amounts for the Company's customers during the Recovery Period associated with Accumulation Period 22, beginning with the billing month of October 2016:

Customer Voltage Level	Cents per kWh Adjustment
Industrial Aluminum Smelter	0.056 ¢/kWh
Secondary	0.060 ¢/kWh
Primary	0.058 ¢/kWh
Transmission	0.056 ¢/kWh

Filed concurrently with my direct testimony is the tariff sheet that contains the formula that Ameren Missouri used to calculate the FAR. Also included in the tariff sheet are the values for each element of the formula that were used to derive the FAR. This will result in charges under the FAR of approximately \$0.61 per month for a typical residential customer. This is an increase from the FAR currently in effect, which resulted in a refund of approximately \$0.02 per month for the typical residential customer. The primary drivers for this increase were increased fuel costs and lower off-system sales margins. The increase also reflects \$1,979,533 (plus applicable interest) for the Adjustment for Reduction of Service Classification 12(M) or 13(M) Billing Determinants provided for in Rider FAC (sometimes referred to as the "N Factor") for Accumulation Period 22, calculated in accordance with the Commission's *Order Approving Second Stipulation and Agreement* in Case No. ER-2016-0130.

1	Q:	How did you develop the various values used to derive the proposed FAR shown on
2		the tariff sheet?
3	A:	The data upon which Ameren Missouri based the values for each of the variables in the
4		approved FAR formula is shown in Schedule EW-FAR. This schedule contains all of the
5		information that is required by 4 CSR 240-3.161(7)(A), the additional N factor
6		adjustment data described earlier and includes the workpapers that support the data
7		contained in Schedule EW-FAR. I have also included Schedule EW-TU, which is a
8		reproduction of Schedule EW-TU filed in the separate true-up docket for the nineteenth
9		Recovery Period, which as earlier noted is being filed concurrently with the initiation of
10		this docket. ²
11	Q:	If the rate schedule filed by Ameren Missouri is approved or allowed to go into
12		effect, what safeguards exist to ensure that the revenues the Company collects do
13		not exceed the net energy costs that Ameren Missouri actually incurred during the
14		Accumulation Period?
15	A:	Ameren Missouri's Rider FAC and the Commission's rules provide two mechanisms to
16		ensure that amounts collected from customers do not exceed Ameren Missouri's actual,
17		prudently-incurred ANEC. First, Rider FAC and the Commission's rules require a true-
18		up of the amounts collected from customers through Rider FAC, with any
19		excess/unrecovered amounts to be refunded/billed to customers through prospective
20		adjustments to the FAR calculation, with interest at Ameren Missouri's short-term
21		borrowing rate. Second, Ameren Missouri's ANEC are subject to periodic prudence

² While the Commission's FAC rules allow filings relating to changes in ANEC to be combined in one filing with the true-up of past Recovery Periods, after consultation with the Staff it is the Company's understanding that the Staff prefers separate filings, but also prefers that sums reflected in such concurrently-filed true-ups be included in the new FAR rates filed in the separate Accumulation Period filing.

1		reviews to ensure that only prudently-incurred net energy costs are collected from
2		customers through Ameren Missouri's Rider FAC. These two mechanisms serve as
3		checks that ensure that the Company's customers pay only the prudently-incurred ANEC
4		and no more.
5	Q:	What action is Ameren Missouri requesting from the Commission with respect to
6		the rate schedule that the Company has filed?
7	A:	As provided by 4 CSR 240-20.090(4), the Commission Staff (the "Staff") has thirty (30)
8		days from the date the revised FAC rate schedule is filed to conduct a review and to make
9		a recommendation to the Commission as to whether the rate schedule complies with the
10		Commission's rules, the requirements of Section 386.266, RSMo (Cum. Supp. 2013), and
11		Ameren Missouri's approved Rider FAC. If the Commission finds the revised Rider
12		FAC rate schedule does comply, the FAR will take effect either pursuant to a
13		Commission order approving the FAR or by operation of law, in either case within 60
14		days after the FAR is filed. Because Ameren Missouri believes its filing satisfies all of
15		the requirements of applicable statutes, the Commission's rules and Ameren Missouri's
16		approved Rider FAC, Ameren Missouri requests that after the Staff's review, the
17		Commission approve the FAR to be effective with the billing month of October 2016.
18	Q:	Does this conclude your direct testimony?
19	A:	Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Adjustm d/b/a Ameren Missouri's Fue the 22 nd Accumulation Perio)	File No. ER-2017-						
AFFIDAVIT OF ERIK C. WENBERG									
STATE OF MISSOURI)								
CITY OF ST. LOUIS) ss)								
Erik C. Wenberg, being first	duly sworn on his oath	ı, states:							
1. My name is E	1. My name is Erik C. Wenberg. I work in the City of St. Louis, Missouri, and I am								
employed by Ameren Service	employed by Ameren Services as Director of Wholesale Power and Fuel Accounting.								
2. Attached here	2. Attached hereto and made a part hereof for all purposes is my Direct Testimony								
on behalf of Union Electric C	Company d/b/a Ameren	ı Missouri consi	isting of						
Schedule <u>EW-FAR HC</u> , all of which have been prepared in written form for filing in the EW-TU HC above-referenced docket.									
3. I hereby swea	r and affirm that the in	formation conta	ined in	the attached testimony					
to the questions therein prop	ounded is true and corre	ect.							
	<u></u>	Erik C. Wenbe	rg						
Subscribed and sworn to before me this 22 day of July, 2016. Subscribed and sworn to before me this 22 day of July, 2016. Notary Public									
My commission expires:									
2-2(-18 Notary Public - Notary Seal State of Missouri Commissioned for St. Louis City My Commission Expires: February 21, 2018 Commission Number: 14939572									

SCHEDULES EW-TU AND EW-FAR ARE HIGHLY CONFIDENTIAL IN THEIR ENTIRETY