Exhibit No.:

Issue(s): Weather Normalization Witness: Steven M. Wills Sponsoring Party: Union Electric Company
Type of Exhibit: Rebuttal Testimony Case No.: ER-2008-0318

Date Testimony Prepared: October 14, 2008

MISSOURI PUBLIC SERVICE COMMISSION

Case No. ER-2008-0318

REBUTTAL TESTIMONY

OF

STEVEN M. WILLS

ON

BEHALF OF

UNION ELECTRIC COMPANY d/b/a AmerenUE

> St. Louis, Missouri October, 2008

1		REBUTTAL TESTIMONY
2		OF
3		STEVEN M. WILLS
4		CASE NO. ER-2008-0318
5	Q.	Please state your name and business address.
6	A.	My name is Steven M. Wills. My business address is One Ameren Plaza,
7	1901 Choutea	au Avenue, St. Louis, Missouri 63103.
8	Q.	By whom and in what capacity are you employed?
9	A.	I am employed by Ameren Services Company as Managing Supervisor,
10	Quantitative Analytics.	
11	Q.	Are you the same Steven M. Wills who filed direct testimony in this case?
12	A.	Yes, I am.
13	Q.	What is the purpose of your rebuttal testimony?
14	A.	The purpose of my rebuttal testimony is to comment on the Missouri Public
15	Service Com	mission Staff's ("Staff") weather normalization adjustment and provide my
16	understanding	g of the agreed upon resolution of the differences between Union Electric
17	Company d/b	/a AmerenUE ("AmerenUE" or "Company") and Staff on this issue.
18	Q.	Did Staff use substantially the same methodology as the Company to
19	weather nor	malize test year sales in their direct case?
20	A.	For most customer classes, yes. The one exception was the Large Primary
21	Service Class	s ("LPS"). For this class, Staff chose in its direct case to bypass the class level
22	analysis base	d on daily load research for a customer specific approach based on billing data
23	from the test	year.

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Q.	Other than the LPS class, were there any differences between Staff's
weather nor	malization adjustment and the Company's?
A.	Yes. There were two other notable differences.
Q.	What was the first difference?
A.	At the time the Company filed its case, some of the actual temperature data
from the test	year was still preliminary data. That means that it had not been through the
thorough scre	eening process that the National Climatic Data Center uses to verify and correct
temperature	readings. By the time of Staff's direct filing, the finalized data was available
and was subs	sequently used in Staff's analysis. The Company agreed that it is appropriate to
use this final data in the analysis for this case.	
Q.	What was the other difference you noted above?
A.	The other difference surrounded the handling of the extra day in the test year
that comes as	s a result of 2008 being a "leap year." In both the procedure for calculating the
normal weath	her temperature series and the method chosen by Staff to perform the "days'
adjustment,"	the handling of the leap day was different than the method adopted by the
Company.	
Q.	Has this issue been worked out between the parties?
A.	Yes. The Company has agreed for purposes of this case to use Staff's normal
weather serie	es and days' adjustment. Although the Company prefers the methodology it used
in this case, i	t believes that Staff's method was not unreasonable.
Q.	Now please discuss the issue over the LPS class in more detail.
A.	The LPS class is made up of many of the Company's largest commercial and
	weather nor A. Q. A. from the test thorough screet temperature and was subst use this final Q. A. that comes as normal weath adjustment," Company. Q. A. weather series in this case, if

industrial accounts. Staff chose to review each customer's test year bills individually to

- determine if the customer was weather sensitive, and then performed a weather adjustment at
- 2 the customer level. The Company followed a similar methodology to what it used for its
- 3 other classes, employing class level daily load research to evaluate the weather response of
- 4 the entire class as a whole, and make an adjustment based on that weather response function.
- 5 Q. How have the two parties agreed to resolve this issue?
- A. It is my understanding from conversations with Staff that they have agreed to
- 7 use the Company's methodology for the LPS class along with their actual weather and
- 8 treatment of leap day as discussed above.
- 9 Q. Did any other parties address weather normalization in their direct
- 10 cases?
- 11 A. No, they did not.
- Q. So are there any remaining issues to be resolved on the subject of weather
- 13 **normalization?**
- 14 A. I am not aware of any remaining issues. Subject to Staff's confirmation, I
- 15 consider the issue resolved.
- 16 Q. Does this conclude your rebuttal testimony?
- 17 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

AFFI STATE OF MISSOURI	DAVIT OF STEVEN M. WILLS
CITY OF ST. LOUIS) ss)
Steven M. Wills, being first du	aly sworn on his oath, states:
1. My name is Ste	even M. Wills. I am employed by Ameren Services
Company as Managing Superv	visor, Quantitative Analytics in the Corporate Planning
department.	
2. Attached hereto	o and made a part hereof for all purposes is my Rebuttal
Testimony on behalf of Union	Electric Company, d/b/a AmerenUE, consisting of <u>3</u>
pages, all of which have been	prepared in written form for introduction into evidence in
the above-referenced docket.	
3. I hereby swear	and affirm that my answers contained in the attached
testimony to the questions then	rein propounded are true and correct.
	Steven M. Wills
Subscribed and sworn to before	re me this 10th day of October, 2008. Omanda Tesdall
My commission expires:	Notary Public
wry commission expires:	Amanda Tesdali - Notary Public Notary Seal, State of Missouri - St. Louis County Commission #07158967 My Commission Expires 7/29/2011