

Exhibit No.:  
Issue(s): Missouri School Board  
Association Pilot  
Program  
Witness: Timothy L. Eggers  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Party: Union Electric Company  
File No.: GR-2021-0241  
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**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO. GR-2021-0241**

**REBUTTAL TESTIMONY**

**OF**

**TIMOTHY L. EGGERS**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**D/B/A AMEREN MISSOURI**

**St. Louis, Missouri**  
**October, 2021**

**REBUTTAL TESTIMONY**

**OF**

**TIMOTHY L. EGGERS**

**FILE NO. GR-2021-0241**

1                                   **I.     INTRODUCTION**

2           **Q.     Please state your name and business address.**

3           A.     My name is Timothy L. Eggers. My business address is One Ameren Plaza,  
4 1901 Chouteau Ave., St. Louis, Missouri.

5           **Q.     Are you the same Timothy L. Eggers that submitted direct testimony**  
6 **in this case?**

7           A.     Yes, I am.

8           **Q.     To what testimony or issues are you responding?**

9           A.     I am responding to the direct testimony of the Missouri School Board  
10 Association's ("MSBA") in the instant case. MSBA witness Louie Ervin suggests the  
11 Commission order Ameren Missouri, Staff, and MSBA work collaboratively to develop School  
12 Transportation Program ("STP") tariffs that address certain imbalance cashout concerns put  
13 forth by MSBA. He proposes that this effort occur shortly after the end of the Pilot program  
14 discussed in my testimony, for implementation prior to the winter of 2022-2023. MSBA  
15 suggests that the stipulation in the pending Spire Missouri gas rate case, File No. GR-2021-  
16 0108, be the basis for the Ameren Missouri tariff.

17           **Q.     Does Ameren Missouri object to this approach?**

18           A.     No, we do not object to this general approach, but we do have several concerns  
19 regarding suggestions made by Mr. Ervin relating to the timeline proposed and to provisions in

1 the cited Spire Stipulation. Ameren Missouri also cautions the Commission that the results of  
2 the Pilot program may, or may not, support a tariff change for STP participants.

3 **Q. What concerns does Ameren Missouri have regarding the timeline?**

4 A. MSBA's suggestion for collaborative discussions in the late summer of 2022  
5 with the resulting tariff to be effective for the winter of 2022-23 may not provide adequate time  
6 for Ameren Missouri to prepare for and implement tariff changes. It might be that this Pilot  
7 needs to run a couple of years, as the first years were impacted by COVID-19, and may not  
8 provide a realistic basis to make a decision on the viability of the Pilot approach. Additionally,  
9 tariff changes that require significant operational adjustments and changes to information  
10 systems may make MSBA's suggested timeline unachievable. We cannot estimate the time or  
11 expenditure required for implementation until final tariff provisions are agreed upon, but we  
12 know there will be programming time and cost required to implement the changes proposed.  
13 Finally, the timeline proposed by MSBA could require tariff changes outside of a general rate  
14 case. Ameren Missouri would need to ensure that the just and reasonable rates and revenues set  
15 forth in this (or a future) proceeding are not impacted by the tariff provisions and  
16 implementation and operating costs.

17 **Q. What concerns do you have related to the capacity release obligations and**  
18 **cashout remedies suggested by MSBA?**

19 A. First, the Pilot currently under way at Ameren Missouri is very different than  
20 the Spire tariff. In fact, our Pilot was designed as an alternative to the Spire model. For example,  
21 the current Pilot does not require Ameren Missouri to calculate capacity needs, which is  
22 something the Spire model does require. I am unsure how MSBA expects the results of our  
23 current Pilot would support a switch to the Spire approach.

1 Ameren Missouri is willing to consider the Spire model but it is important to recognize  
2 that gas supply assets, manpower, transportation program tariffs, and demand characteristics are  
3 vastly different between the gas utilities in the state so that a one-size-fits-all tariff approach may  
4 not be appropriate. The Spire stipulation prescribes capacity release obligations, imbalance  
5 rollovers, and other departures from our current operations that Ameren Missouri has not had  
6 adequate time to review and analyze. We cannot, at this time, confirm agreement to a tariff that  
7 adopts all of the provisions contained in the Spire stipulation.

8 **Q. Notwithstanding these concerns, is Ameren Missouri willing to work with**  
9 **MSBA on this issue?**

10 A. Yes, Ameren Missouri is willing to work with all stakeholders and will entertain  
11 tariff changes that conform to principled ratemaking and ensure fairness between transportation,  
12 sales, and MSBA customers. That process will include an analysis of the Pilot program's  
13 impacts on the STP customer group. The results will be used to determine the benefits of  
14 potential tariff changes to be weighed against the costs.

15 **Q. Does this conclude your testimony?**

16 A. Yes.

