

*Exhibit No.:*  
*Issue:* Tariffs, Rate Design  
*Witness:* Kim Cox  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2019-0077  
*Date Testimony Prepared:* June 7, 2019

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**OPERATIONAL ANALYSIS DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**KIM COX**

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

**CASE NO. GR-2019-0077**

*Jefferson City, Missouri  
June 2019*

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1  
2 **RESPONSE TO AMEREN MISSOURI'S PROPOSED SERVICE LINE EXTENSION**  
3 **AND RELOCATION**

4 Q. What is Ameren Missouri's current distinction of service line and  
5 extension costs?

6 A. Currently, the Company bases the extension cost on customer type of  
7 Residential versus non-Residential customers.

8 Q. Is Ameren Missouri proposing to change the distinction?

9 A. Yes. Ameren Missouri is proposing to change the distinction based on the size  
10 of the pipe being installed or relocated. Customer contributions for service line extensions and  
11 relocations would be a service line less than 2" or a service line 2" and greater.

12 Q. Does Ameren Missouri propose any other changes?

13 A. Yes. Currently Ameren Missouri's service pipe charge for all customer types is  
14 \$260 per connection plus \$4.30 per foot for all footage in excess of sixty feet. Ameren Missouri  
15 proposes to continue the connection charge of \$260 with an increase to \$6.00 for all footage in  
16 excess of sixty feet for service lines less than 2". For those greater than 2", Ameren Missouri  
17 proposes to apply a 3 year projected revenue to be received from the customer and apply it  
18 against the total cost of the service extension. Any service extension cost above the projected  
19 3 year revenue will be billed to the customer upon completion of the installation.

20 Q. Does Staff have any concerns with the proposed changes?

21 A. Yes. Although, Staff does not oppose the new distinction or the 3 year projected  
22 revenue toward the cost of the service extension however; Staff does propose additional  
23 language be added to Tariff Sheet No. 19. Section A. and B. Staff proposes to add  
24 "All customer payments received under this section will be applied as an offset to rate base."

1  
2 **RESPONSE TO AMEREN MISSOURI'S PROPOSED DAILY USAGE**  
3 **INFORMATION CHARGE FOR TRANSPORTATION CUSTOMERS**  
4

5 Q. What is the proposed tariff language for the daily usage information charge?

6 A. Ameren Missouri's proposed tariff language is:

7 H. Daily Usage Information Charge

8 Applicable to Customers who enter into contracts with  
9 the Company for transportation service to be provided  
10 under the Company's Natural Gas Transportation  
11 Service tariff:

12 In order to facilitate remote interrogation of  
13 interval metering by the Company and provide daily  
14 usage information to Customer, the Company will  
15 install a remote monitoring device at each meter  
16 location where Customer receives Transportation  
17 Service. For each remote monitoring device, the  
18 Customer, at Customer's expense, shall provide access  
19 to a commercial telephone line and 120 volt AC  
20 electric power at a location designated by the  
21 Company. The telephone line shall be dedicated for  
22 Company's use. If a Customer does not provide access  
23 to a commercial telephone line and 120 volt AC  
24 electric power at a location designated by the  
25 Company, or, if interrogation is not possible due to  
26 a telephone service outage, Company will dispatch  
27 technicians each month with specialized equipment to  
28 capture the daily usage information necessary to bill  
29 Customer.

30 The charge to the Customer will be \$170.00 for each  
31 occurrence.

32 If phone line is installed and Company is unable to  
33 retrieve daily usage information it will be the  
34 Customer's responsibility to verify that the  
35 Customer's phone line is in working condition. In  
36 addition, Company reserves the right to charge  
37 Customers for each service call to investigate the  
38 remote monitoring device if such service call is the  
39 sole result of telephone service outage.  
40

Rebuttal Testimony of  
Kim Cox

1 Q. Is the daily usage information charge a new charge proposed by Ameren Missouri?

2 A. Yes, it is a new charge. Therefore, Staff recommends that Ameren Missouri track each  
3 occurrence of the \$170 charge by customer and customer class. Staff also recommends the  
4 daily usage information be retained and made available to Staff for review.

5 Q. Does this conclude your rebuttal testimony?

6 A. Yes.

**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 Increase        )  
its Revenues for Natural Gas Service             )            Case No. GR-2019-0077

**AFFIDAVIT OF KIM COX**

STATE OF MISSOURI        )  
  )  
COUNTY OF COLE         )            ss.

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

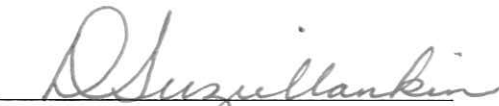
Further the Affiant sayeth not.

  
\_\_\_\_\_ )  
KIM COX

**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 5<sup>th</sup> day of June 2019.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: December 12, 2020  
Commission Number: 12412070

  
\_\_\_\_\_ )  
Notary Public