

Exhibit No. 218

Commission Staff – Exhibit 218
Brooke Mastrogiannis
Rebuttal Testimony
File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:
Issues: *Tariff Issue,
Fuel Adjustment Clause*
Witness: *Brooke Mastrogiannis*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2021-0240*
Date Testimony Prepared: *October 15, 2021*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

BROOKE MASTROGIANNIS

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

CASE NO. ER-2021-0240

*Jefferson City, Missouri
October 2021*

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BROOKE MASTROGIANNIS
UNION ELECTRIC COMPANY
d/b/a Ameren Missouri
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REBUTTAL TESTIMONY OF
BROOKE MASTROGIANNIS
UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
CASE NO. ER-2021-0240

Q. Please state your name, employment position, and business address.

A. Brooke Mastrogiannis, Utility Regulatory Supervisor with the Missouri Public Service Commission (“Commission”), 200 Madison Street, Jefferson City, Missouri 65101.

Q. Are you the same Brooke Mastrogiannis who has previously provided testimony in this case?

A. Yes. I contributed to the *Staff Report - Cost of Service (Public and Confidential) with Appendices* (“COS Report”) filed on September 3, 2021, and the *Staff Report - Class Cost of Service with Appendices (Public and Confidential)* (“CCOS Report”) filed on September 17, 2021.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to address Ameren Missouri witness Andrew Meyer’s Fuel Adjustment Clause (“FAC”) direct testimony in which he requests the continuation of the Company’s FAC with modifications and Mr. Meyer’s Schedule AMM-D3 revised FAC tariff sheets. I will propose various revisions to the Company’s proposed modifications to the FAC tariff. I will also address Office of the Public Counsel (“OPC”) witness Lena Mantle’s direct testimony in which she requests a few changes to the Company’s FAC.

EXECUTIVE SUMMARY

Q. Please summarize your rebuttal testimony.

1 A. Staff does not oppose some of the FAC tariff revisions Mr. Meyer proposes in
2 Schedule AMM-D3. These specific FAC tariff proposals are discussed further below. However,
3 Staff does oppose the FAC tariff proposals in Mr. Meyer's Schedule AMM-D3 that are specific
4 to the transmission percent and the base factor.

5 Staff does not oppose the proposed FAC revisions made by OPC witness
6 Lena M. Mantle in her direct testimony. These specific FAC proposals are discussed further
7 below.

8 **FUEL ADJUSTMENT CLAUSE**

9 Q. Please explain the Company's proposed revisions to the FAC tariff sheets.

10 A. On Original Sheet No. 71.18 and 71.19 the Company proposes to add the
11 language "or any subsequent renewable subscription program that is approved by the
12 Commission in an order that acknowledges that such program's impacts should be excluded
13 from Factor PP".

14 On Original Sheet No. 71.21 the Company proposes to add the language, "or any
15 subsequent renewable subscription program that is approved by the Commission in an order
16 that acknowledges that such program's impacts should be excluded from Factor OSSR".

17 On Original Sheet No. 71.27 the Company proposes to add the MISO Charge Type
18 "RT Schedule 49 Distribution".

19 On Original Sheet No. 71.30 the Company proposes to add
20 "Schedule 1A2- Transmission Congestion Rights Administration, Schedule 1A3- Integrated
21 Marketplace Clearing Administration, and Schedule 1A4- Integrated Marketplace
22 Facilitation Administration."

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1 Q. Is Staff opposed to the Company's proposed FAC tariff revisions as explained
2 in the previous Q&A?

3 A. No.

4 Q. To which FAC tariff proposals as described in Mr. Meyer's Schedule AMM-
5 D3 is Staff opposed?

6 A. The Company proposes on Original Sheet No. 71.19 to change the transmission
7 service cost reflected in FERC Account 565 and transmission revenues reflected in FERC
8 Account 456.1 to 1.87%. Staff proposes that these transmission costs and revenues should be
9 2.52%¹. These transmission costs and revenues will be updated with Staff's surrebuttal/true-up
10 direct testimony to be filed on November 5, 2021.

11 The Company proposes on Original Sheet No. 71.22 to rebase the summer base factor
12 to \$0.01149 and winter base factor to \$0.01036. Staff proposed in Direct to rebase the summer
13 base factor to \$0.01147 and winter base factor to \$0.00991 instead². Staff's proposed base
14 factors consist of costs and revenue from Staff's normalized calculations and fuel modeling
15 which in some instances utilizes a more updated time period than Ameren Missouri's direct
16 filed case.³ Staff will true-up its recommended base factor summer and winter rates in its
17 surrebuttal/true-up direct testimony to be filed on November 5, 2021

18 Q. Please explain the OPC's proposed revisions to the FAC.

¹ Staff's Direct Class Cost of Service Report page 70.

² Staff's Direct Class Cost of Service Report page 69.

³ These normalized calculations and fuel modeling were provided by Staff witnesses Lisa M. Ferguson and Shawn E. Lange, PE as part of the Direct Cost of Service Accounting Schedules.

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1 A. OPC witness Lena M. Mantle proposes to modify the FAC tariff sheets to
2 specifically state the cost of basemat coal is not an FAC cost⁴. Ms. Mantle also proposes that
3 the FAC explicitly require the removal of the energy costs for research and development
4 projects from the actual net energy costs (“ANEC”) of the FAC⁵.

5 Q. Is Staff opposed to the OPC’s FAC tariff proposals discussed above?

6 A. No.

7 Q. What other FAC issue did OPC propose?

8 A. The OPC proposes that stakeholders should work together to establish
9 modifications to Ameren Missouri, Evergy, and Liberty’s FACs that would clarify for all
10 stakeholders the process if another sharp, sudden cost increase impacts the cost and revenues
11 that flow through the FAC (i.e. February Storm Uri)⁶.

12 Q. What is Staff’s response to the OPC’s proposal?

13 A. Staff is open to a stakeholder meeting between all parties mentioned above, and
14 would be interested to hear a more detailed plan from OPC.

15 Q. Does this conclude your rebuttal testimony?

16 A. Yes, it does.

⁴ Ms. Mantle’s Direct Testimony page 7 and 8.

⁵ Ms. Mantle’s Direct Testimony page 8 and 9.

⁶ Ms. Mantle’s Direct Testimony pages 6 and 7.

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 Adjust Its)
Revenues for Electric Service) Case No. ER-2021-0240

AFFIDAVIT OF BROOKE MASTROGIANNIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

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

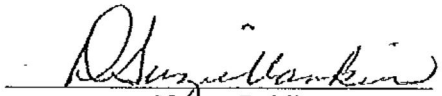
Further the Affiant sayeth not.


BROOKE MASTROGIANNIS

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 13th day of October 2021.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070


Notary Public