

*Exhibit No.:*  
*Issue:* Staff Memorandum  
*Witness:* Mark Kiesling  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* EC-2023-0037  
*Date Testimony Prepared:* June 5, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**MARK KIESLING**

**Missouri Coalition for Fair Competition and  
Corey Malone, Complainants**

**v.**

**Union Electric Company,  
d/b/a Ameren Missouri, Respondent**

**CASE NO. EC-2023-0037**

*Jefferson City, Missouri  
June 2024*

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **MARK KIESLING**

4 **Missouri Coalition for Fair Competition and**  
5 **Corey Malone, Complainants**

6 **v.**

7 **Union Electric Company,**  
8 **d/b/a Ameren Missouri, Respondent**

9 **CASE NO. EC-2023-0037**

10 Q. Please state your name and business address.

11 A. Mark Kiesling, P.O. Box 360, Jefferson City, Missouri 65102

12 Q. By whom are you employed and in what capacity?

13 A. I am a Senior Research and Data Analyst in the Energy Resources Department  
14 of the Industry Analysis Division.

15 Q. What is your educational background and work experience?

16 A. Please refer to the attached Schedule MK-r1.

17 Q. Have you previously filed testimony before the Commission?

18 A. Yes. Please refer to Schedule MK-r1 for a list of cases in which I have filed  
19 testimony or recommendations.

20 **EXECUTIVE SUMMARY**

21 Q. Please summarize your rebuttal testimony?

22 A. I am sponsoring the *Staff Memorandum* (Public and Confidential) (“Staff  
23 Memorandum”), which was originally filed on April 12, 2023, in Case No. EC-2023-0037,  
24 copies of which are attached as Confidential Schedule MK-r2.

1 **STAFF REPORT**

2 Q. Please describe Staff's report.

3 A. Staff conducted a review of all the allegations within Missouri Coalition for  
4 Fair Competition ("MCFFC") and Corey Malone's formal Complaint against Union Electric  
5 Company, d/b/a Ameren Missouri ("Ameren" or "Company"), and set forth a conclusion  
6 based on its investigation.

7 Q. How did Staff conduct its review?

8 A. Staff conducted its review through a series of data requests that were sent to  
9 the Complainants and scheduled meetings with the Complainants and Ameren's employees.  
10 Staff also examined the noted programs referred to and the information provided in the formal  
11 Complaint as well as reviewed applicable statutes and regulations.

12 Q. Please explain the organizational format of the Staff Memorandum.

13 A. The Staff Memorandum has been organized by topic as follows:

- 14 I. EXECUTIVE SUMMARY
- 15 II. INTRODUCTION AND BACKGROUND
- 16 III. SUMMARY OF COMPLAINT
- 17 IV. RELIEF SOUGHT
- 18 V. STAFF'S INVESTIGATION
- 19 VI. CONCLUSION

20 Q. What did Staff's memorandum conclude?

21 A. Based on Staff's review of information provided by MCFFC, Mr. Malone, and  
22 Ameren, Staff's investigation did not find any violations by the Company of any applicable  
23 statutes, Commission rules or regulations, or Commission-approved tariff.

24 Q. Does this conclude your rebuttal testimony?

25 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

Missouri Coalition for Fair Competition and	)	
Corey Malone,	)	Case No. EC-2023-0037
Complainants	)	
	)	
v.	)	
	)	
Union Electric Company, d/b/a Ameren Missouri,	)	
Respondent	)	

**AFFIDAVIT OF MARK KIESLING**

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW MARK KIESLING and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Mark Kiesling*; and that the same is true and correct according to his best knowledge and belief.

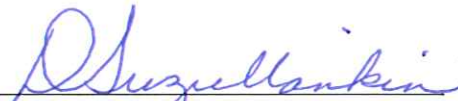
Further the Affiant sayeth not.

  
MARK KIESLING

**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 3rd day of June 2024.

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

## Mark Kiesling

### CURRENT POSITION:

I am currently a Senior Research and Data Analystist in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

### EDUCATIONAL BACKGROUND & WORK EXPERIENCE:

I received my Bachelor of Science Degree in Marketing from Lincoln University in December of 2001. In October of 2014 I began employment with the Missouri Public Service Commission as a Utility Management Analyst II. In January of 2018, I was promoted to a Senior Research/Data Analyst.

### Case Summary

<b>Case Number</b>	<b>Company</b>	<b>Issues</b>
EC-2015-0309	Kansas City Power & Light Company (Electric)	Policy/Complaint
SA-2015-0065	Missouri American Water	CCN Case
SA-2015-0150	Missouri American Water	CCN Case
SM-2017-0187	Lake Region Water & Sewer CO, Camden Public Water	Merger/Sale
SM-2018-0117	Confluence Rivers	Merger/Sale
WR-2017-0343	Gascony Water Company, Inc.	Policy
ER-2019-0374	Empire Electric	C&I Custom Rebate Program
EE-2020-0351	Ameren Missouri	Variance/Waiver for Commission Rule
ER-2021-0240	Ameren Missouri	Rate Case
ER-2022-0337	Ameren Missouri	Rate Case
EC-2023-0037	Ameren Missouri	Complaint

INFORMATION CONTAINED  
IN THIS STAFF MEMORANDUM  
HAS BEEN DEEMED  
CONFIDENTIAL  
IN ITS ENTIRETY