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including Lead-Lag Study
Witness: Benjamin Hasse
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2024-0369

DIRECT TESTIMONY

OF

BENJAMIN HASSE

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
September 2024**

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I. INTRODUCTION

1
2 **Q. Please state your name and business address.**

3 A. Benjamin Hasse, Union Electric Company d/b/a Ameren Missouri
4 ("Ameren Missouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St.
5 Louis, Missouri 63103.

6 **Q. What is your position with Ameren Missouri?**

7 A. I am employed by Ameren Missouri as Manager, Regulatory Accounting
8 and the Cost Allocation Manual ("CAM").

9 **Q. Please describe your educational background and employment**
10 **experience.**

11 A. I received a Bachelor of Science degree and a Master's degree in
12 Accountancy from Truman State University in 2013. I am a licensed Certified Public
13 Accountant in the State of Missouri. From 2013 to 2015, I worked for KPMG in St. Louis,
14 Missouri, as an auditor. From 2015 to 2019, I worked for Ameren Services Company
15 ("AMS") in various finance roles including in the General Accounting and Financial
16 Services Department. From 2019 to 2022, I worked for Ameren Missouri as the CAM
17 Manager. My primary responsibility was Ameren Missouri's compliance with Missouri's
18 affiliate transaction rules. From 2022 to present, I have been working for Ameren Missouri

1 as a Manager of Regulatory Accounting and continue my previous responsibilities as the
2 CAM Manager.

3 **II. PURPOSE OF TESTIMONY**

4 **Q. What is the purpose of your direct testimony?**

5 A. The purpose of my direct testimony is to develop the revenue requirement
6 (cost of service) for the gas operations of Ameren Missouri. The revenue requirement
7 determines the level of gas revenues required to pay operating expenses, to provide for
8 depreciation and taxes, and to give investors an opportunity to earn a fair and reasonable
9 return on the Company's investment. Ameren Missouri witness Michael Harding uses this
10 data as the starting point for his class cost of service study as well as for the design of
11 proposed rates. Also, I will discuss the lead/lag study prepared for Ameren Missouri's gas
12 business that I used to develop cash working capital ("CWC") factors. The CWC factors
13 were used to calculate the Company's cash working capital requirements included in the
14 revenue requirement.

15 **Q. Are you sponsoring any schedules in connection with your direct**
16 **testimony?**

17 A. Yes. I am sponsoring Schedules BMH-D1 through BMH-D17.

18 **Q. What is the subject matter of these schedules?**

19 A. Schedules BMH-D1 through BMH-D16 develop the various elements of the
20 revenue requirement to be considered in arriving at the proper level of rates for the
21 Company's gas service based on the test year of the twelve months ended March 31, 2024,
22 with pro forma adjustments and updates for known and measurable changes to be tried-up
23 through December 31, 2024. Additionally, schedules BMH-D1 through BMH-D16 reflect

1 a discrete pro forma adjustment that goes beyond the true up-date but prior to final rates
2 going into effect that I will discuss later in my testimony. Schedule BMH-D17 reflects the
3 results of the cash working capital lead/lag study prepared as of the twelve months ended
4 December 31, 2020.

5 **Q. Will you please briefly summarize the information provided on each of**
6 **the schedules you are presenting?**

7 A. Each schedule provides the following information:

- 8 • Schedule BMH-D1 – Original Cost of Gas Plant by functional
9 classification at March 31, 2024, per book and pro forma.
- 10 • Schedule BMH-D2 – Gas Plant Reserves for Depreciation and
11 Amortization by functional classification at March 31, 2024, per book
12 and pro forma.
- 13 • Schedule BMH-D3 – Average Fuel Inventories and Average Materials
14 and Supplies Inventories at March 31, 2024, per book and pro forma
15 applicable to gas operations.
- 16 • Schedule BMH-D4 – Average Prepayments at March 31, 2024, per
17 book and pro forma applicable to gas operations.
- 18 • Schedule BMH-D5 – Total Gas Cash Working Capital (per the
19 Company’s lead/lag study) for the twelve months ended March 31,
20 2024, applicable to gas operations.
- 21 • Schedule BMH-D6 – Interest Expense Cash Requirement, Federal
22 Income Tax Cash Requirement, State Income Tax Cash Requirement,
23 and City of St. Louis Earnings Tax Cash Requirement applicable to gas

- 1 operations (per the Company's lead/lag study) for the twelve months
2 ended March 31, 2024.
- 3 • Schedule BMH-D7 – Average Gas Customer Advances for
4 Construction and Average Gas Customer Deposit reductions to rate base
5 at March 31, 2024.
 - 6 • Schedule BMH-D8 – Regulatory Asset and Liability balances included
7 in rate base at March 31, 2024, per book and pro forma.
 - 8 • Schedule BMH-D9 – Total Gas Accumulated Deferred Income Taxes
9 at March 31, 2024, per book and pro forma.
 - 10 • Schedule BMH-D10 – Total Gas Operating Revenues for the twelve
11 months ended March 31, 2024, per book and pro forma.
 - 12 • Schedule BMH-D11 – Total Gas Operations and Maintenance
13 Expenses, by functional classification, for the twelve months ended
14 March 31, 2024, updated for certain known items, per book and pro
15 forma. A description of each pro forma adjustment is included.
 - 16 • Schedule BMH-D12 – Depreciation and Amortization Expenses
17 applicable to gas operations, by functional classification, for the twelve
18 months ended March 31, 2024, per book and pro forma. A description
19 of each pro forma adjustment is included.
 - 20 • Schedule BMH-D13 – Taxes Other Than Income Taxes, for the twelve
21 months ended March 31, 2024, per book and pro forma for the gas
22 operations of the Company. A description of each pro forma adjustment
23 is included.

- 1 • Schedule BMH-D14 – Income Tax Calculation at the proposed rate of
- 2 return and statutory tax rates for the total gas operations of the
- 3 Company.
- 4 • Schedule BMH-D15 – The pro forma Gas Net Original Cost Rate Base
- 5 at March 31, 2024, and Gas Revenue Requirement including the pro
- 6 forma adjustments.
- 7 • Schedule BMH-D16 – The annual revenue increase required at a
- 8 7.398% return on Net Original Cost Gas Rate Base, including pro forma
- 9 adjustments.
- 10 • Schedule BMH-D17 – Cash Working Capital Factors.

11 **III. REVENUE REQUIREMENT**

12 **Q. What do you mean by "revenue requirement"?**

13 A. The revenue requirement of a utility is the sum of operations and

14 maintenance expenses, depreciation and amortization expenses, taxes, and a fair and

15 reasonable return on the net value of property used and useful in serving its customers (and

16 other rate base amounts). The revenue requirement is based on a test year and it is necessary

17 to make certain "pro forma" adjustments in order to reflect conditions existing at the end

18 of the trued-up test year, as well as significant changes that are known or reasonably certain

19 to occur closer to when new rates would take effect.

20 The revenue requirement represents the total funds (revenues) that must be

21 collected by the Company if it is to pay employees and suppliers, satisfy tax liabilities, and

22 provide a fair return to investors. To the extent that current revenues are less than the

23 revenue requirement, as is true in this case, a rate increase is required.

1 **Q. What test year is the Company proposing to use to establish the revenue**
2 **requirement in this proceeding?**

3 A. The Company is proposing a test year consisting of the twelve months
4 ended March 31, 2024 ("test year"), with pro forma adjustments to account for the true-up
5 of various items through December 31, 2024 ("true-up date"), consistent with the approach
6 used in the Company's previous rate cases. The Company is proposing to true-up the
7 following items: plant-in-service, depreciation reserve, materials and supplies (including
8 gas inventories), prepayments, cash working capital (excluding CWC factors), customer
9 advances for construction, customer deposits, accumulated deferred income taxes, pension
10 and other post-employment benefits ("OPEB"), tracked regulatory asset/liability balances,
11 certain components of normalized revenues, payroll (including any wage increases that
12 become effective on or before January 1, 2025), employment levels, other employee
13 benefits, insurance expense, bad debt expense, Pay as You Save ("PAYS"), the Missouri
14 Public Service Commission ("MPSC") assessments, capital structure, capital costs,
15 depreciation expense, income taxes, non-income taxes, and various amortizations (such as
16 the pension & OPEB tracker amortization). Finally, the Company proposes that other
17 significant items that may arise through the true-up date, both increases and decreases,
18 should be trued-up through December 31, 2024.

19 The Company's revenue requirement also reflects a discrete adjustment that goes
20 beyond the true up date of December 31, 2024. This adjustment reflects the inclusion in
21 the revenue requirement for the second phase of the Northeast Territory project, Highway
22 161 to Silex ("Northeast Territory Phase 2"), that is expected to go into service during July
23 of 2025. My testimony will describe the impacts of this adjustment on the revenue

1 requirement while the testimony of Company witnesses Steven Wills and Pamela Harrison
2 will discuss the policy considerations and project details.

3 **Q. Why is it necessary to make pro forma adjustments to the test year**
4 **data?**

5 A. In ratemaking, rates are set for the future. It is often necessary to adjust the
6 test year data to be more representative of future operating conditions. Pro forma
7 adjustments allow for the newly-authorized rates to be more likely to have the opportunity
8 to produce the allowed rate of return during the period they are in effect. This requires pro
9 forma adjustments to reflect known and measurable changes from historical test year
10 levels.

11 **Q. Please explain Schedule BMH-D1.**

12 A. Schedule BMH-D1 shows the recorded original cost of gas plant by
13 functional classification at March 31, 2024, along with the estimated plant additions and
14 other adjustments through December 31, 2024, which is the end of the Company's
15 proposed true-up period. Additionally, as I discussed earlier, this schedule reflects the
16 discrete forward-looking adjustment to include Northeast Territory Phase 2. The
17 Company's plant accounts are recorded on the basis of original cost as defined by the
18 Uniform System of Accounts and prescribed by the MPSC.

19 **Q. Please explain the addition of forecasted plant in-service in pro-forma**
20 **adjustments 1 and 2.**

21 A. The Company continues to spend significant amounts on infrastructure
22 replacements and improvements. In order to provide the Company an opportunity to earn
23 a fair and reasonable return on its total investment, it is necessary for the cost of service to

1 reflect, as closely as possible, the level of the Company's investment at the time new rates
2 will become effective. Adjustment 1 adds the estimated plant-in-service additions of
3 \$89,597,000 from March 31, 2024 through December 31, 2024, which is the end of the
4 proposed true-up period. Adjustment 2 adds the estimated plant-in-service additions of
5 \$50,142,000 for the Northeast Territory Phase 2 discussed earlier in my testimony.

6 **Q. Please explain the addition of General and Intangible Plant applicable**
7 **to gas operations.**

8 A. General and Intangible Plant assets, such as general office buildings, the
9 central warehouse, the central garage, software, computers and office equipment, are used
10 in both the electric and gas operations. For convenience, such investments are presented as
11 electric plant in our accounting records. Adjustment 2 adds the portion of the multi-use
12 General Plant and Intangible Plant applicable to the Company's gas operations of
13 \$29,010,000 and 39,297,000, respectively.

14 **Q. Please explain the reduction to gas plant-in-service for incentive**
15 **compensation?**

16 A. In past Ameren Missouri rate reviews, a portion of the Company's incentive
17 compensation paid has either been disallowed or was not requested for recovery by the
18 Company. Within the accounting records of the Company, a portion of the incentive
19 compensation was capitalized and added to plant-in-service. Adjustment 3 reduces the
20 plant-in-service balance by \$2,154,000 for the accumulated amount of any previously
21 disallowed or not requested capitalized incentive compensation.

22 **Q. Why is the Company reclassifying certain plant amounts?**

1 A. Adjustment 4 reflects the reclassification of \$7,262,000 from Distribution
2 Plant to General Plant relating to the Company's investment in Advanced Metering
3 Infrastructure ("AMI"). This adjustment will be memorialized in the Company's books and
4 records by the true-up date.

5 **Q. After reflecting the above pro forma adjustments, what amount of gas**
6 **plant-in-service is the Company proposing to include in rate base?**

7 A. As shown on Schedule BMH-D1, the total gas plant-in-service is
8 \$900,917,000.

9 **Q. What pro forma adjustments were made to the accumulated reserve**
10 **for depreciation on Schedule BMH-D2?**

11 A. Similar adjustments were made to the accumulated reserve balance of plant-
12 in-service. Adjustment 1 increases the depreciation reserve by \$10,835,000 to reflect the
13 depreciation through the true-up date for plant-in-service investments existing at March
14 31, 2024.

15 Adjustment 2 increases the depreciation reserve by \$2,171,000 to reflect the
16 depreciation related to pro forma net additions to plant-in-service from March 31, 2024,
17 through December 31, 2024, the proposed true-up date.

18 Adjustment 3 increases the accumulated reserve by \$7,430,000 for the multi-use
19 General Plant applicable to gas operations and the accumulated amortization of
20 \$24,040,000 for Intangible Plant applicable to gas operations. These adjustments
21 correspond to Adjustment 2 made to the plant accounts in Schedule BMH-D1.

22 The accumulated depreciation and amortization reserve is reduced by \$710,000 in
23 Adjustment 4 to reflect the accumulated depreciation and amortization applicable to a

1 portion of capitalized incentive compensation reflected in Adjustment 3 on Schedule
2 BMH-D1.

3 Adjustment 5 reflects the reclassification of accumulated reserve related the plant
4 reclassification discussed in Adjustment 4 in Schedule BMH-D1.

5 The pro forma accumulated provision for depreciation and amortization, as shown
6 on Schedule BMH-D2, applicable to total gas plant-in-service is \$282,779,000.

7 **Q. Please explain Schedule BMH-D3.**

8 A. Schedule BMH-D3 shows the average investment in fuel inventories and
9 materials and supplies at March 31, 2024. Fuel inventory consists of gas stored
10 underground. General materials and supplies includes items such as pipe, valves, fittings,
11 and general supplies.

12 Adjustment 1 shown in Schedule BMH-D3 increases general materials and supplies
13 included in rate base by \$2,344,000 for the portion of thirteen-month average general
14 materials and supplies inventory applicable to the Company's gas operations.

15 Adjustment 2 increases gas stored underground inventory by \$3,267,000 to reflect
16 thirteen-month average levels.

17 **Q. What is the amount of the pro forma fuel and materials and supplies
18 applicable to gas operations?**

19 A. The pro forma fuel and materials and supplies applicable to total gas
20 operations, as shown on Schedule BMH-D3, is \$8,383,000.

21 **Q. Please explain the average prepayments shown in Schedule BMH-D4.**

22 A. Certain costs for items such as rent, insurance, medical and dental voluntary
23 employee beneficiary association ("VEBA") contributions, memberships, and service

1 agreements related to software maintenance are paid in advance. The prepaid software
2 maintenance agreements are paid for initially by Ameren Services Company ("AMS"), and
3 then AMS bills the Company for its portion of the prepaid asset. The Company settles its
4 intercompany billings with AMS monthly. After elimination of amounts applicable to
5 electric operations, the thirteen-month average balance of total gas prepayments at March
6 31, 2024, is \$1,309,000.

7 **Q. Please explain Schedule BMH-D5.**

8 A. Schedule BMH-D5 shows the calculation of the gas cash working capital
9 requirement as a negative cash requirement of (\$3,906,000), which is based on a lead/lag
10 study for the twelve months ended December 31, 2020, including the pro forma
11 adjustments to the operating expenses. I will explain the details of the lead/lag study later
12 in this testimony.

13 **Q. What appears on Schedule BMH-D6?**

14 A. The federal income, state income tax, city earnings tax, and interest expense
15 cash requirements applicable to the Company's gas operations (per the Company's lead/lag
16 study) are shown in Schedule BMH-D6. The payment lead times for these items are based
17 on actual or statutory due dates. I will explain the details of the lead/lag study later in this
18 testimony.

19 **Q. What is the cash requirement for federal income taxes, state income
20 taxes, city earnings tax, and interest expense?**

21 A. Reflecting the payment lead times for each of these items compared to the
22 revenue lag results in cash requirements of \$28,000 for federal income taxes, \$5,000 for

1 state income taxes, and negative cash requirements of (\$15,000) and (\$1,544,000) for city
2 earnings tax and interest expense, respectively.

3 **Q. What items are shown in Schedule BMH-D7?**

4 A. The thirteen-month average balances at March 31, 2024, for gas customer
5 advances for construction and gas customer deposits are shown in Schedule BMH-D7.
6 These items represent cash provided by customers that can be used by the Company until
7 they are refunded. Therefore, the average balances for the customer advances for
8 construction and customer deposits are reductions to the Company's rate base.

9 Customer advances for construction are cash advances made by customers that are
10 subject to refund to the customer in whole or in part. These advances provide the Company
11 cash that offsets the cost of the construction until they are refunded. The thirteen-month
12 average balance of gas customer advances for construction at March 31, 2024, is \$598,000.

13 Customer deposits are cash deposits made by customers which are subject to refund
14 to the customer if the customer develops a good payment record. The Company pays
15 interest on the deposits, which is shown as a customer account expense in Schedule BMH-
16 D11. The thirteen-month average balance of gas customer deposits at March 31, 2024, was
17 \$1,595,000.

18 **Q. What is shown on Schedule BMH-D8?**

19 A. Schedule BMH-D8 shows the regulatory asset and liability balances
20 included in rate base, including the pension and OPEB regulatory liability balances, the
21 property tax tracker regulatory asset, the PAYS regulatory liability, and a regulatory asset
22 for expired & expiring amortizations.

1 The pension and OPEB regulatory liability balances of \$8,608,000 and \$2,556,000,
2 respectively, reflect amortization of the tracked balances established in File No. GR-2021-
3 0241 through the true-up date and accumulation through the true-up date for the current
4 accumulation period. The Company proposes that the remaining balances as of the true-up
5 date for all pension and OPEB deferrals established prior to File No. GR-2021-0241 be
6 combined into the expired & expiring amortizations regulatory liability included in rate
7 base and to be amortized as part of the expired & expiring amortizations discussed in
8 Adjustment 5 on Schedule BMH-D12. Additionally, the Company proposes to refund the
9 remaining regulatory liability balance from File No. GR-2021-0241 over 2 years and the
10 most recent accumulation period, from October 1, 2021 through the true-up date, over a
11 period of 5 years, consistent with the approach agreed to and approved in File No. ER-
12 2022-0337.

13 In the Unanimous Stipulation and Agreement in File No. EO-2018-0211, the
14 Company agreed to include the PAYS regulatory asset or liability in rate base in future
15 reviews. The \$576,000 PAYS regulatory liability reflects the total deferrals made under
16 the PAYS program less any amortization recorded or expected to be recorded by the true-
17 up date.

18 Beginning with the Unanimous Stipulation and Agreement in File No. GR-2019-
19 0077, the Company has combined and netted the true-up date balances of regulatory assets
20 and liabilities that have expired (and over-amortized) since the Company's last rate review
21 or are expected to expire soon after the true-up date. Any over- or under-recovery of a
22 regulatory asset/liability is treated in the same manner as the underlying regulatory
23 asset/liability, meaning that if the underlying regulatory asset/liability was included in rate

1 base the over-/under-recovery shall also be included in rate base, but if the underlying
2 regulatory asset/liability was not included in rate base neither shall the over-/under-
3 recovery be. The Company proposes to continue that approach in this case.

4 In accordance with this approach, a regulatory asset of \$112,000 increases the
5 Company's rate base for the combined effect of regulatory assets and liabilities that were
6 previously included in rate base, but which will expire prior to the true-up date in this case
7 (or soon after). The combined over or under-recovery of such regulatory assets and
8 liabilities expected through December 31, 2024, has also been included in this adjustment.

9 **Q. Has the Company implemented the Property Tax Tracker established**
10 **by Section 393.1275, RSMo.?**

11 A. Yes. Section 393.1275, RSMo., adopted by the Missouri General Assembly
12 and signed into law by Governor Parson (effective August 28, 2022) establishes a property
13 tax tracker for various utilities, including Ameren Missouri and its gas operations. Line 3
14 of Schedule BMH-D8 includes a \$4,390,000 property tax tracker regulatory asset balance,
15 representing actual and estimated deferrals (expense levels above the uncontested property
16 tax amount of 8,126,016¹ from File No. GR-2021-0241) from September 2021 through the
17 true-up date. In this case, the Company proposes to set the base level for the property tax
18 tracker at \$10,287,000.

19 **Q. Has the Company continued to apply the property tax refund tracker**
20 **ordered in File Nos. GR-2019-0077 and GR-2021-0241?**

21 A. Yes.

¹ This amount also serves as the base amount for the tracking mechanism relating to property tax refunds, which was agreed upon in File No. GR-2021-0241.

1 **Q. How should these two property tax trackers be applied during periods**
2 **in which they are both effective?**

3 A. As part of the stipulation and agreement in File No. GR-2019-0077, the
4 Company agreed to refund to customers all property tax refunds associated with tax years
5 dating back to 2009 reduced by unrecovered property tax increases experienced since 2009
6 and consultant fees incurred in obtaining said refunds. The stipulation and agreement in
7 File No. GR-2021-0241 continued this tracker established in GR-2019-0077. At the time
8 of this filing, the Company has received approximately \$9 million in property tax refunds
9 and expects future property tax refunds to be approximately \$17 million, for a total of \$26
10 million. The unrecovered costs required as an offset per the tracker that the Company has
11 experienced to date are approximately \$16 million. As a result, the Company expects to
12 retain the next approximately \$7 million of gas property tax refunds and refund to
13 customers the remaining \$10 million. No unrecovered property taxes will reduce or offset
14 any property tax refunds applicable to customers after September 1, 2022 due to the
15 implementation of the statutory property tax tracker discussed above.

16 **Q. Please explain Schedule BMH-D9.**

17 A. Schedule BMH-D9 lists the accumulated deferred income taxes ("ADIT")
18 applicable to total gas operations at March 31, 2024, and the pro forma adjustments
19 required to project the balances forward to December 31, 2024, the end of the proposed
20 true-up period. ADIT is the net result of normalizing the tax benefits resulting from timing
21 differences between the periods in which transactions affect taxable income and the period
22 in which such transactions affect the determination of pre-tax income.

1 Currently, the Company has deferred income taxes in Federal Energy Regulatory
2 Commission ("FERC") Accounts 190, 282, and 283. As shown on Schedule BMH-D9, the
3 total gas pro forma ADIT balance is a net liability balance of \$82,393,000. Net deferred
4 income tax liabilities are a deduction from rate base.

5 **Q. What is the Company's pro forma net original cost gas rate base at**
6 **December 31, 2024?**

7 A. The Company's total gas rate base as shown in Schedule BMH-D15 is
8 \$530,575,000.

9 **Q. Please explain Schedule BMH-D10.**

10 A. Schedule BMH-D10 shows total gas operating revenues per book and pro
11 forma for the twelve months ended March 31, 2024 with customer growth and other pro
12 forma adjustments through December 31, 2024, the end of the proposed true-up period.

13 **Q. Please explain the pro forma adjustments to the gas operating revenues**
14 **shown in Schedule BMH-D10.**

15 A. The following pro forma adjustments are shown in Schedule BMH-D10:

16 Adjustment 1 eliminates revenue add-on taxes of \$7,549,000, as they are directly
17 passed through to customers by the Company. Adjustment 2 increases revenues by
18 \$4,959,000 to reflect normal weather. Adjustment 3 eliminates the PGA revenues of
19 \$68,504,000, as they are collected through the PGA Rider, rather than through the base
20 rates. Adjustment 4 decreases revenues by \$2,951,000 to synchronize the book revenues
21 with the Company's billing unit rate analysis. Adjustment 5 eliminates unbilled revenues
22 of \$7,849,000 to reflect the book revenues on a bill cycle basis. Other gas revenues were
23 increased by \$44,000 in Adjustment 6 to annualize the amount of PAYS program revenues.

1 Adjustment 7 increases revenues by \$555,000 to reflect expected customer growth through
2 December 31, 2024. Since the Company uses cycle and window billing, revenues are
3 reduced by \$1,277,000 to reflect the twelve-month billing year as a twelve-month, 365-
4 day, calendar year in Adjustment 8. Adjustment 9 decreases other revenues by \$49,000 to
5 annualize revenues from intercompany facility rental. The provision for rate refunds of
6 \$2,481,000, applicable to the operation of the Company's PGA, is eliminated in Adjustment
7 10. Further discussion of revenue Adjustments 2, 4, 7, and 8 can be found in the direct
8 testimony of Ameren Missouri witness Michael Harding.

9 **Q. What are the pro forma gas operating revenues for the twelve months**
10 **ended March 31, 2024?**

11 A. The pro forma gas operating revenues for the twelve months ended March
12 31, 2024 are \$79,939,000.

13 **Q. Please describe what is shown in Schedule BMH-D11.**

14 A. Total gas operations and maintenance expense ("O&M") for the twelve
15 months ended March 31, 2024 (per books by functional classification), the pro forma gas
16 O&M expenses by functional classification, and a listing of the pro forma adjustments to
17 O&M are shown in Schedule BMH-D11.

18 **Q. Please explain the pro forma adjustments to gas O&M expense for the**
19 **twelve months ended March 31, 2024.**

20 A. A summary of the pro forma adjustments to O&M appears in Schedule
21 BMH-D11. Adjustment 1 reflects the increased labor expenses related to union and
22 management wage increases at January 1, 2024, and January 1, 2025. A 3.5% wage
23 increase for union employees was effective January 1, 2024, per the labor contracts. A

1 3.56% wage increase for management employees was effective January 1, 2024. In
2 addition, the Company expects union and management employees to receive average wage
3 increases of 3.1% effective January 1, 2025. The annualized increase in the total gas
4 operating labor expense resulting from wage increases is \$1,144,000. These wage increases
5 reflect known and measurable changes that either have occurred or will occur subsequent
6 to the test year. Incentive compensation was excluded from the calculation of the wage
7 increases, as wage increases only apply to base wages.

8 Adjustment 2 reduces O&M expenses by \$171,000 to eliminate the incentive
9 compensation that is based on the achievement of earnings-per-share ("EPS") goals of the
10 Company and, for the remaining incentive compensation not eliminated, adjust from
11 expenses recognized to payments made under the plans during the test year.

12 Consistent with prior cases, Adjustment 3 reduces O&M expenses by \$593,000 to
13 eliminate the portion of long-term incentive compensation that is based on total shareholder
14 return ("TSR"),² including the allocated Ameren Services Company amount.

15 Adjustment 4 decreases O&M expenses by \$28,000 to adjust bad debt expense to
16 the level of bad debt net write-offs from the test year.

17 Adjustment 5 decreases O&M expenses by \$48,000 for the annual amortization of
18 the PAYS regulatory assets expected at the true-up date. The amortization period relating
19 to the incremental deferrals will be calculated based on the remaining weighted useful life
20 of measures installed under the program at the proposed true-up date.

21 Adjustment 6 decreases O&M by \$35,000 to annualize salaries and benefits
22 expenses based on staffing levels as of the end of the test year. This adjustment is consistent

² TSR is a measure of how well a publicly traded company is performing financially. TSR measures returns from both changes in the Company's stock price and from the dividends it pays over any given period.

1 with the past practice of adjusting for the on-going employment levels experienced through
2 the true-up date and allows for newly-authorized rates to most closely align with the
3 Company's costs.

4 Adjustment 7 eliminates O&M expense related to the cost of purchased gas and
5 other related costs and expenses of \$59,867,000 that are collected through the PGA Rider.

6 Adjustment 8 is an increase of \$151,000 to O&M expenses to reflect interest
7 expense at 9.5% on the thirteen-month average customer deposit balance as of March 31,
8 2024. The average customer deposit is deducted from rate base.

9 The various insurance policies of the Company are renewable at different times
10 during the test year. Adjustment 9 increases O&M expense by \$174,000 to annualize the
11 premiums of the various insurance policies in effect, or expected to be in effect, at the time
12 new rates are expected to be implemented in this case.

13 Adjustment 10 increases O&M by \$11,000 to reflect increases in the other
14 employee benefits expense to annualize the employee benefits expense through the
15 proposed true-up period.

16 O&M expenses are increased by \$11,000 in Adjustment 11 to annualize the costs
17 of the non-qualified pension plan, which is no longer in the pension tracker, to reflect the
18 annualized calendar year 2024 level of expense.

19 Adjustment 12 decreases O&M expenses by \$5,221,000 to rebase the pension and
20 OPEB tracker to reflect applicable annualized calendar year 2024 expense levels³.

21 Adjustment 13 is a decrease in O&M of \$1,793,000 to remove test year pension
22 and OPEB tracker amortization, to amortize the remaining asset and liability balances from

³ In this case, the Company proposes to set the base levels for the pension and OPEB trackers at (\$4,008,000) and (\$1,780,000), respectively.

1 File No. GR-2021-0241 as of the true-up date over two years, and to amortize the
2 regulatory liability balances from the most recent accumulation period, from October 1,
3 2021, through the true-up date, over a period of five years. As discussed above in Schedule
4 BMH-D8, the Company proposes that the remaining balances as of the true-up date for all
5 pension and OPEB tracker deferrals established prior to GR-2021-0241 be combined into
6 the expired & expiring amortizations regulatory asset included in rate base. Amortization
7 of these remaining balances is included in the expired & expiring amortizations discussed
8 in BMH-D12.

9 Adjustment 14 increases rate case and depreciation study expenses by \$221,000 to
10 reflect the average rate case and depreciation study expenses incurred by the Company in
11 the last three general rate cases and recovery of these costs over a two-year period.

12 Adjustment 15 increases O&M expenses by \$48,000 to annualize the increase in
13 building rent expense.

14 Adjustment 16 decreases O&M expenses by \$35,000 for identified electric costs
15 which were allocated to gas operations in the test year.

16 Adjustment 17 increases O&M by \$69,000 for an increase in depreciation that is
17 charge to O&M for transportation and heavy-duty equipment. Depreciation expense
18 charged to O&M was updated for investment levels at December 31, 2024, and
19 depreciation rates proposed in this rate review.

20 Adjustment 18 decreases O&M expense by \$66,000 to annualize applicable
21 expenses based on current allocation factors.

22 In Adjustment 19, the Company eliminated \$34,000 of O&M expenses for certain
23 Ameren Corporation Board of Directors chartered flight expenses.

1 Adjustment 20 reduces O&M expense by \$470 to annualize software rental expense
2 expected to be paid to other Ameren affiliates that are allocated to gas operations through
3 the true-up date.

4 Adjustment 21 decreases O&M expenses by \$4,000 to remove electric vehicle
5 incentive costs which were inappropriately allocated to gas operations in the test year.

6 Adjustment 22 increases O&M expenses by \$719,000 for customer convenience
7 charges (e.g., credit card fees) that are included in the Company's revenue requirement in
8 accordance with File No. GR-2021-0241. This adjustment reflects a thirteen-month
9 average ending March 31, 2024 at the most recent fee rates.

10 Adjustment 23 increases O&M expenses by \$21,000 to annualize the MPSC
11 assessment from July 2023.

12 Finally, adjustment 24 decreases O&M expense by \$125,000 to annualize the
13 reduction in meter reading costs based on expected progress in the Company's AMI
14 deployment at December 31, 2024.

15 **Q. What is the impact on total gas operations and maintenance expense**
16 **from the above pro forma adjustments?**

17 A. As shown in Schedule BMH-D11, the total gas operations and maintenance
18 expenses are decreased from \$100,726,000 to \$35,275,000, or a total net decrease of
19 \$65,451,000 by the above pro forma adjustments.

20 **Q. What is shown in Schedule BMH-D12?**

21 A. Schedule BMH-D12 shows the total gas depreciation and amortization
22 expense by functional classifications for the twelve months ended March 31, 2024, per
23 book and pro forma through the true-up date.

1 **Q. What pro forma adjustments apply to the depreciation and**
2 **amortization expenses?**

3 A. Schedule BMH-D12 details the following pro forma adjustments to the
4 depreciation and amortization expenses:

5 Adjustment 1 increases depreciation and plant amortization by \$9,659,000 to reflect
6 the book depreciation annualized for the plant-in-service depreciable balances at March
7 31, 2024, and plant additions through the true-up period, based on current depreciation
8 rates approved in File No. GR-2021-0241.

9 Adjustment 2 increases the depreciation expense by \$36,000 to reflect the change
10 in depreciation rates reflected in the depreciation study submitted in this case, which was
11 conducted by Company witness John J. Spanos from Gannett Fleming Valuation and Rate
12 Consultants, LLC

13 The depreciation expense for transportation equipment (Account 392) and heavy
14 duty equipment (Account 396) is charged to O&M rather than depreciation expense.
15 Adjustment 3 reduces depreciation expense by \$959,000 to remove the depreciation
16 expense on these accounts.

17 In accordance with the Stipulation and Agreement in GR-2021-0241, the Company
18 deferred all amortization related to AMI software until the software began to support gas
19 modules placed in-service. This software began to support gas modules in-service in
20 October of 2023 and the Company subsequently began to amortize the associated deferrals
21 in November 2023. Adjustment 4 increases amortization expense by \$186,000 to annualize
22 the amortization of the AMI software deferrals.

1 As previously referenced, the Company has combined and netted the true-up date
2 balances of regulatory assets and liabilities that have expired (and over-amortized) since
3 the Company's last rate review or are expected to expire soon after the true-up date. Any
4 over or under-recovery that will exist as of the true-up date will be tracked, combined, and
5 netted for the following balances:

Balance Description	December 31, 2024 Balance (Projected)
Pension Tracker (tranches prior to GR-2021-0241) – Rate Base	\$55,096
OPEB Tracker (tranches prior to GR-2021-0241) – Rate Base	\$57,102
Extended Regulatory Amort (established in GR-2021-0241) – Non-Rate Base	\$24,241
Excess Deferred Tracker (established in GR-2021-0241)– Non- Rate Base	(\$11,941)
Total under-recovery	\$124,499

6 These tracked, combined, and netted balances will be amortized over a three-year
7 period. Adjustment 5 increases amortization by \$187,000 to amortize the combined and
8 netted over- and under-collections associated with expired and expiring regulatory asset
9 and liability balances and to remove test year amortization associated with the expired and
10 expiring regulatory asset and liability balances established in File No. GR-2021-0241.

11 Adjustment 6 increases amortization expense by \$33,000 to recover the COVID-
12 19 Accounting Authority Order deferral resulting from File No. GU-2021-0112 over the
13 remaining five-year period established in GR-2021-0241.

1 Adjustment 7 increases amortization by \$185,000 to eliminate amortization of the
2 excess deferred tax tracker regulatory liability balance established in GR-2021-0241,
3 eliminate test year deferrals, and amortize the current accumulation period balance over a
4 three year period.⁴ The remaining unamortized regulatory liability balance established in
5 GR-2021-0241 as of the true-up date have been added to the expired & expiring
6 amortizations discussed in Adjustment 5 above.

7 As discussed earlier in my testimony describing schedule BMH-D8, the Company's
8 case includes a regulatory asset for the Property Tax Tracker. Adjustment 9 increases
9 amortization by \$1,463,000 to reflect recovery the property tax tracker deferrals over a
10 period of 3 years.

11 **Q. What are the total gas pro forma depreciation and amortization**
12 **expenses?**

13 A. As reported in Schedule BMH-D12, the total gas pro forma depreciation
14 and amortization expenses are \$26,103,000.

15 **Q. Please explain Schedule BMH-D13.**

16 A. Schedule BMH-D13 shows the taxes other than income taxes for the twelve
17 months ended March 31, 2024, per book and pro forma.

18 **Q. Please list the pro forma adjustments required to arrive at the total gas**
19 **pro forma taxes other than income taxes as detailed in Schedule BMH-D13.**

20 A. The following pro forma adjustments detailed in Schedule BMH-D13 are
21 required to arrive at the total gas pro forma taxes other than income taxes. Adjustment 1

⁴ In this case, the Company proposes to set the base level for the excess deferred tax tracker at \$906,345, grossed up.

1 increases Federal Insurance Contributions Act ("FICA") taxes by \$26,000 to reflect the pro
2 forma wage adjustments.

3 Adjustment 2 increases property taxes by \$266,000 to reflect property taxes
4 expected to be paid in December 2024

5 Adjustment 3 decreases taxes other than income taxes to remove Missouri gross
6 receipts taxes of \$7,052,000, as they are add-on taxes that are directly passed through from
7 customers. The pro forma book revenues also reflect the removal of the add-on revenue
8 taxes.

9 **Q. What are the total gas pro forma taxes other than income taxes?**

10 A. As reflected on Schedule BMH-D13, the pro forma total gas taxes other
11 than income taxes are \$11,451,000.

12 **Q. What is shown in Schedule BMH-D14?**

13 A. Schedule BMH-D14 shows the derivation of the income tax calculation at
14 the requested 7.398% rate of return for total gas operations reflecting statutory tax rates.
15 Refer to the direct testimony of Ameren Missouri witness Darryl T. Sagel for the
16 development of the 7.398% rate of return.

17 **Q. As shown in Schedule BMH-D14 what are the income taxes at the
18 requested rate of return for total gas operations?**

19 A. The total current federal, state, and city earnings income taxes using the
20 statutory tax rates at the requested rate of return are \$8,488,000 for total gas operations, as
21 shown in Schedule BMH-D14. Deferred income taxes for total gas operations of \$988,000
22 are also shown in Schedule BMH-D14. Net current and deferred income taxes for gas
23 operations are \$7,501,000.

1 **Q. Please explain Schedule BMH-D15.**

2 A. Schedule BMH-D15 shows the total gas rate base of \$530,575,000 and the
3 total gas revenue requirement of \$119,585,000 at the requested rate of return of 7.398%.

4 **Q. What does Schedule BMH-D16 reflect?**

5 A. Schedule BMH-D16 compares the total gas revenue requirement of
6 \$119,585,000 with the total gas pro forma operating revenues under the present rates of
7 \$79,938,000. It shows that the revenue requirement is \$39,647,000 more than the pro forma
8 operating revenues at present rates. This is the amount of additional revenues Ameren
9 Missouri needs to collect each year to recover its cost of service, including an opportunity
10 to recover its cost of capital.

11 **IV. CASH WORKING CAPITAL ANALYSIS**

12 **Q. For what period was the cash working capital lead/lag study**
13 **performed?**

14 A. The lead/lag study analyzed the Company's cash transactions and invoices
15 for the twelve months ending December 31, 2020. This study was utilized in File No. GR-
16 2021-0241. This study is less than 5 years old and it remains appropriate to rely on this
17 study in this rate review.

18 **Q. Please define what you mean by the phrase "cash working capital."**

19 A. Cash working capital is the amount of funds required to finance the day-to-
20 day operations of the Company.

21 **Q. What is a lead/lag study?**

22 A. A lead/lag study is an analysis of revenue lags and expense leads. CWC
23 requirements are generally determined by lead/lag studies that are used to analyze the lag

1 time between the date customers receive service and the date that customers' payments are
2 available to the Company (i.e., the revenue lag). This lag is offset by a lead time during
3 which the Company receives goods and services but pays for them at a later date (i.e., the
4 expense lead). The "lead" and "lag" are both measured in days. The dollar-weighted lead
5 and lag days are then divided by 365 to determine a daily CWC factor. This CWC factor
6 is then multiplied by the annual test year cash expenses to determine the amount of cash
7 working capital required for operations. The resulting amount of cash working capital is
8 then included in the Company's rate base.

9 **Q. Please explain the revenue lag in more detail.**

10 A. As noted, the revenue lag refers to the elapsed time between the delivery of
11 the Company's product (i.e., gas) and its ability to use the funds received as payment for
12 the delivery of the product. The revenue lag actually consists of three components as
13 follows: the service lag, which is the number of days from the mid-point of the service
14 period to the meter reading date; the billing lag, which is the time between when the meter
15 is read and the bill is sent; and the collections lag, which is the time between when the bill
16 is sent to the customer and when the customer's payment is received by the Company.

17 **Q. Please explain the expense lead in more detail.**

18 A. An expense lead refers to the elapsed time from when a good or service is
19 provided to the Company to the point in time when the Company pays for the good or
20 service and the funds are no longer available to the Company. There are a number of
21 different expense leads, since the Company acquires goods and services from a number of
22 different sources.

23 **Q. What sources of information are employed to determine the leads**

1 **and lags in a CWC analysis for the Company?**

2 A. Information from the Accounts Payable, Customer Service, Human
3 Resources, Payroll, Treasury Management, and Tax systems are utilized. The information
4 derived from these sources, together with analyses of specific invoices, is used to determine
5 the appropriate number of lead/lag days for the Company's gas business.

6 **Q. How should the results of the CWC analysis be treated for ratemaking**
7 **purposes?**

8 A. The CWC requirement should be included as part of Ameren Missouri's
9 rate base for ratemaking purposes, and I have included it in my calculation of the revenue
10 requirement as previously discussed.

11 **Q. Was one revenue lag applied to all of the Company's revenues?**

12 A. No. The Company calculated a base revenue lag that was then weighted for
13 relevant components applicable to retail and interchange sales revenues. This weighted
14 revenue lag was applied to all cash operating revenues with the exception of pass-through
15 taxes. A separate revenue lag was calculated and applied to all revenues associated with
16 pass-through taxes.

17 **Q. How was the base revenue lag determined?**

18 A. The base revenue lag measures the average number of days from the date
19 service was rendered by the Company until the date payment was received from customers
20 and such funds were deposited by the Company. In the calculation, the revenue lag was
21 divided into three distinct components: 1) service lag; 2) billing lag; and 3) collections lag.
22 Considered together, these three components of the base revenue lag totaled 39.42 lag days.
23 An explanation of each component of the base revenue lag follows.

1 **Q. What is meant by service lag?**

2 A. The service lag refers to the number of days from the mid-point of the
3 service period to the meter reading date for that service period. Using the mid-point
4 methodology, the average lag associated with the provisioning of service was 15.21 days
5 (365 days in the year divided by 12 months divided by 2).

6 **Q. What is meant by billing lag?**

7 A. Billing lag refers to the average number of days from the date on which the
8 meter was read until the customer was billed. The billing lag was determined by analyzing
9 the Company's monthly billing schedules and meter reading records. The average billing
10 lag was determined to be 0.93 days.

11 **Q. What is meant by collections lag?**

12 A. The collections lag refers to the average amount of time from the date when
13 the customer received a bill to the date that the Company received payment from its
14 customers. Based on weighted average data from the Company's Customer Service System,
15 the average collection lag was determined to be 23.28 days.

16 **Q. What data was used to calculate the collections lag?**

17 A. The Company used data from the bill payment report which was created to
18 support the calculation of the collections lag.

19 **Q. Please describe the bill payment report used in the collections lag**
20 **calculation.**

21 A. The Company developed a bill payment report to aggregate actual customer
22 payments. This allows us to better understand customer payment behavior. The bill
23 payment report compares the date a customer is billed to the date the bill was paid to arrive

1 at the lag days. The bill payment report summarizes the dollar amounts collected per lag
2 day. The lag days for each line item are capped at 150 days. Each line item is then weighted
3 to calculate the weighted lag days. The bill payment report was run monthly for the period
4 from January 2020 to December 2020.

5 **Q. How were uncollectible revenues treated in your analysis?**

6 A. The bill payment report aggregates actual customer payments. Therefore,
7 an adjustment for uncollectible revenues is not needed in the analysis.

8 **Q. Please summarize the calculation of base revenue lag days.**

9 A. The calculation of the overall base revenue lag, by lag component, is
10 summarized in the following table. Please note that the revenue lag pertains to revenue lag
11 for items other than off-system sales, which I will address below.

Base Revenue Lag Component	Lag Days
Service	15.21
Billing	0.93
Collections	23.28
Total Revenue Lag	39.42

12 **Q. How does the revenue lag applied to pass-through taxes differ from the**
13 **base revenue lag?**

14 A. The only difference between the base revenue lag and the revenue lag,
15 which is applied to pass-through taxes is that the revenue lag applied to pass-through taxes
16 excludes the service lag. Therefore, the revenue lag applied to pass-through taxes is 24.21
17 days.

1 **Q. Why should a different revenue lag be applied to the pass-through tax**
2 **revenues?**

3 A. In prior cases, the Commission Staff has argued that pass-through taxes are
4 not generated as a result of the provisioning of a service by the utility.⁵ Therefore, in these
5 proceedings a revenue lag which excludes a lag associated with the provisioning of utility
6 service has been applied to the pass-through tax revenues.

7 **Q. Are the revenues attributable to pass-through taxes collected in the**
8 **same manner and at the same time as all other revenues?**

9 A. Yes. The Company's customers pay one bill. That bill (and thus the
10 payment) includes both operating revenues associated with the provisioning of gas service
11 as well as revenues associated with pass-through taxes.

12 **Q. What impact does the exclusion of the service lag from the revenue lag**
13 **associated with pass-through taxes have on the CWC calculation?**

14 A. The service lag represents the period of time during which the Company has
15 provided a service for which it has not yet been compensated. Since the Company serves
16 primarily as a collect and remit agent for the various taxing bodies, by excluding the service
17 lag from the revenue lag applied to the pass-through taxes, the Company is reflecting that
18 it has no out-of-pocket expense for which it is awaiting payment.

19 **Q. What expense-related leads were considered in the lead/lag analysis?**

20 A. Lead times associated with the following expense categories were
21 considered in the lead/lag study: a) employee pensions and benefits; b) base payroll; c)

⁵ Such proceedings include File Nos. ER-2010-0036 (AmerenUE), ER-2008-0318 (AmerenUE), ER-2007-0291 (Kansas City Power & Light Company), ER-2008-0093 (The Empire District Electric Company), GR-2007-0208 (Laclede Electric Company), and GR-2006-0422 (Missouri Gas Energy).

1 payroll taxes (i.e., FICA, Medicare) and other withholdings; d) other operations and
2 maintenance expenses; e) general taxes other than income taxes excluding pass-through
3 taxes; f) pass-through taxes g) federal income taxes; h) state income taxes; i) PGA expense;
4 j) interest on long-term debt; and k) incentive compensation.

5 **Q. What types of leads associated with the Company's employee benefit**
6 **programs were considered in the analysis?**

7 A. The estimated lead times associated with the following major categories of
8 the Company's employee benefit programs were considered: a) group life insurance; b)
9 group health insurance including claims processing, claims payment, and administration
10 costs; c) the Company's 401-K plan; d) contributions to the Company's pension fund; and
11 e) OPEB costs. Taken together, the group life insurance, group health insurance and 401-
12 K plan had a dollar-weighted lead time of 17.65 days. Taken together, the pension and
13 OPEB plans had a dollar-weighted lead time of 15.7 days.

14 **Q. Provide an explanation of the leads associated with the Company's**
15 **payroll expenses.**

16 A. Payroll lead days were determined by calculating the nominal and weighted
17 lead time by pay period and weighting the resulting lead days by the amounts paid by the
18 Company to cover its payroll obligations. The resulting total on a dollar-weighted basis
19 was 10.9 days.

20 **Q. Please explain the lead effects associated with payroll taxes.**

21 A. The Company has outsourced its payroll tax processing to a third-party
22 provider, Ceridian. The payroll taxes outsourced to Ceridian include: a) Federal and State
23 Withholding Taxes; b) Federal and State Unemployment Taxes; c) FICA (Social Security)

1 Taxes and Medicare Taxes for both employee and employer; and d) City of St. Louis
2 Employee Withholding Tax and St. Louis City Employer Expense. Ceridian pulls all
3 payroll taxes out of the Company's bank account on the same date as the employees are
4 paid. Therefore, the payroll taxes lead time is equal to the base payroll lead time of 9.38
5 days.

6 **Q. What are the lead times associated with other operations and**
7 **maintenance expenses?**

8 A. The Company engages in transactions with other vendors (not associated
9 with pensions, benefits, payroll, fuel, or taxes) for a variety of purposes including facility
10 maintenance, system maintenance, and customer service. Invoices from providers of such
11 services were analyzed in order to estimate a lead time associated with payment for services
12 related to other operations and maintenance activities. The analysis indicates that on
13 average, invoices were paid by the Company 43.85 days after receipt.

14 **Q. What are the various general taxes considered in the analysis?**

15 A. The following general taxes were considered in the study: a) Real Estate
16 and Property Taxes; b) Missouri Sales Tax; c) St. Louis Corporate Earnings Taxes; d) Self
17 Procured Insurance Tax; and e) Gross Receipts Taxes. When taxes were required to be paid
18 to a single taxing authority pursuant to a set schedule, the statutory payment dates were
19 considered in the analysis.

20 **Q. Explain the leads that were calculated for each type of general taxes**
21 **considered in the analysis.**

22 A. The treatment of each category of general taxes in the study is described
23 below:

1 1) Real Estate and Property Taxes: All current-year property taxes in Missouri
2 are due on December 31st of the current year. Taking this schedule into consideration, a
3 dollar-weighted expense lead of 183.0 days was calculated.

4 2) Missouri Sales Tax: Missouri sales tax is payable to the Missouri
5 Department of Revenue and was calculated as a percent of billings less a 2 percent timely
6 payment allowance. Estimated payments were made weekly with the tax return and the
7 remaining balance due. Taking this information into account, a weighted expense lead time
8 of 4.5 days was determined.

9 3) St. Louis Corporate Earnings Tax: The Company pays corporate earnings
10 taxes to the City of St. Louis. This tax is paid by check to the City of St. Louis annually on
11 April 1st for the previous year. Taking this information into account, the expense lead time
12 associated with corporate earnings taxes was determined to be 274.50 days.

13 4) Self Procured Insurance Tax: The self-procured insurance tax is paid to the
14 State of Missouri each year. Taking this information into account, the expense lead time
15 associated with self-procured insurance taxes was determined to be 241.50 days.

16 **Q. How did the study address purchased gas adjustment?**

17 A. Staff proposed no cash working capital adjustment to the revenue
18 requirement related to the Company's PGA in File No. GR-2021-0241, and the Company
19 agreed. As such, the Company proposes a net lag of zero for PGA expenses.

20 **Q. What pass-through taxes are included in the CWC analysis?**

21 A. The only pass-through taxes considered in the CWC analysis were Gross
22 Receipts Tax and Missouri Sales Tax.

23 **Q. Please describe the timing of the payment of the Gross Receipt Taxes.**

1 A. Gross receipts taxes are payable to municipalities and counties and are paid
2 as a percent of billings to customers within the taxing authority. These taxes are paid on
3 the last day of the month following the end of a month with the exception of Arnold,
4 Brentwood, Cape Girardeau, Chesterfield, Clayton, Dexter, Fenton, Florissant, Jefferson
5 City, Jennings, Kirksville, Ladue, Maryland Heights, Moberly, St. Louis County, and
6 Wentzville that are paid on the 20th day of the month. Based on the specific tax periods of
7 the various taxing authorities, a dollar-weighted gross receipts tax expense lead time of
8 26.14 days was calculated.

9 **Q. Does the lead time for gross receipts taxes include a service lead?**

10 A. No. Since no service lag was included in the revenue lag assigned to pass-
11 through taxes, there has been no service lead attributed to the gross receipts taxes or
12 Missouri Sales taxes.

13 **Q. Please explain.**

14 A. Both the service lag and the service lead are associated with the timing of
15 the provisioning of service. If there is no service lag on the revenue side, there can be no
16 service lead on the expense side. Therefore, for consistency purposes, I have excluded both
17 the service lag and service lead from the analysis of the pass-through taxes.

18 **Q. How did your study address federal income taxes?**

19 A. The lead time associated with federal income tax payments was based on
20 the provisions of the Internal Revenue Code that require estimated tax payments of 25
21 percent of total income taxes due on April 15, June 15, September 15, and December 15 of
22 the current year. Taking this schedule into consideration a lead time of 38.00 days for
23 federal income tax payments made by the Company was determined.

1 **Q. How did the study address Missouri state income taxes?**

2 A. Missouri state income taxes follow a pattern similar to federal taxes. Thus,
3 assuming quarterly payments due on April 15, June 15, September 15, and December 15
4 of the current year, an expense lead time of 38.00 days was determined.

5 **Q. Provide a description of how lead times associated with the Company's**
6 **interest expenses were addressed by the study.**

7 A. The Company's interest payments on its long-term bonds were made from
8 current revenues. Thus, there was a lead (or lag) between the date the interest payments
9 were collected from customers and the date when such amounts were paid to financial
10 institutions. The Company generally made interest payments on its fixed rate long-term
11 debt twice a year at varying times. Using actual due dates on interest payments, a dollar-
12 weighted lead of 91.37 days for interest payments was determined.

13 **Q. How did the study address contributions to the incentive compensation**
14 **plans?**

15 A. The Company made an annual contribution to incentive compensation
16 programs for both the executive plan and the management/bargaining unit plans during the
17 test year. The executive incentive plan contribution is made on the last date in February,
18 while the management/bargaining unit contributions are made during the first pay period
19 in March. Based on an examination of the contributions to the incentive compensation
20 plans, a weighted average lead time of 250.80 days was determined.

21 **Q. Please describe Schedule SJH-D18.**

1 A. Schedule SJH-D18 summarizes the leads and lags discussed in my direct
2 testimony that I used to develop the CWC factors. These CWC factors are used to calculate
3 the Company's cash working capital requirements.

4 **V. CONCLUSION**

5 **Q. Please summarize your testimony and conclusions.**

6 A. My testimony and attached schedules have developed the Company's total
7 gas rate base and revenue requirement, which include continuation of five trackers:
8 uncertain tax positions tracker (a/k/a Fin. 48 Tracker)⁶, pension tracker, OPEB tracker,
9 excess deferred tax tracker, and property tax refund tracker. Additionally, the Company's
10 revenue requirement includes the effects of the statutorily enabled property tax tracker. The
11 testimony also includes the amortization of existing regulatory assets and liabilities. As
12 summarized in Schedule BMH-D17, the Company's total gas revenue requirement,
13 including the Company's proposed 7.398% return on rate base is more than the pro forma
14 operating revenues at the present rates by \$39,649,000. Rates should be designed to
15 increase revenues by \$39,649,000, subject to the true-up in this case.

16 **Q. Does this conclude your direct testimony?**

17 A. Yes, it does

⁶ The base level for the uncertain tax position tracker is set at \$0.

AMEREN MISSOURI
ORIGINAL COST OF GAS PLANT
BY FUNCTIONAL CLASSIFICATION FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>FUNCTIONAL CLASSIFICATION</u> (A)	<u>TOTALS</u> <u>PER</u> <u>BOOKS</u> (B)	<u>PRO FORMA</u> <u>ADJUSTMENTS</u> (C)	<u>PRO FORMA</u> <u>GAS</u> <u>TOTALS</u> (D)
1	INTANGIBLE PLANT	7,269	45,335	52,604
2	PRODUCTION PLANT	-	-	-
3	TRANSMISSION PLANT	8,332	-	8,332
4	DISTRIBUTION PLANT	631,888	119,522	751,410
5	GENERAL PLANT	47,535	43,190	90,725
6	INCENTIVE COMPENSATION CAPITALIZED	-	(2,154)	(2,154)
7	TOTAL PLANT IN SERVICE	<u>\$ 695,024</u>	<u>\$ 205,893</u>	<u>\$ 900,917</u>

PRO FORMA ADJUSTMENTS

AMEREN MISSOURI
TOTAL GAS RESERVES FOR DEPRECIATION AND AMORTIZATION
BY FUNCTIONAL CLASSIFICATION FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>FUNCTIONAL CLASSIFICATION</u> (A)	<u>TOTALS PER BOOKS</u> (B)	<u>PRO FORMA ADJUSTMENTS</u> (C)	<u>PRO FORMA GAS TOTALS</u> (D)
1	INTANGIBLE PLANT	5,366	25,204	30,570
2	PRODUCTION PLANT	(779)	-	(779)
3	TRANSMISSION PLANT	3,362	85	3,447
4	DISTRIBUTION PLANT	218,707	8,565	227,272
5	GENERAL PLANT	12,356	10,623	22,979
6	INCENTIVE COMPENSATION CAPITALIZED	-	(710)	(710)
7	TOTAL DEPRC. & AMORT RESERVE	<u>\$ 239,012</u>	<u>\$ 43,767</u>	<u>\$ 282,779</u>

AMEREN MISSOURI
AVERAGE FUEL AND MATERIALS & SUPPLIES INVENTORIES
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTALS</u> <u>PER</u> <u>BOOKS</u> (B)	<u>PRO FORMA</u> <u>ADJUSTMENTS</u> (C)	<u>PRO FORMA</u> <u>GAS</u> <u>TOTALS</u> (D)
1	GENERAL MATERIALS AND SUPPLIES	0	2,344	2,344
2	GAS STORED UNDERGROUND	<u>2,772</u>	<u>3,267</u>	<u>6,039</u>
3	TOTAL	<u>\$ 2,772</u>	<u>\$ 5,611</u>	<u>\$ 8,383</u>

**AMEREN MISSOURI
AVERAGE PREPAYMENTS
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)**

<u>LINE</u>	<u>DESCRIPTION</u>	<u>TOTALS PER BOOKS(1)</u>	<u>PRO FORMA ADJUSTMENTS</u>	<u>PRO FORMA GAS TOTALS</u>
	(A)	(B)	(C)	(D)
1	RENTS (2)	\$ 9	\$ (9)	\$ -
2	INSURANCE (2)	11,553	(10,794)	759
3	SOFTWARE MAINTENANCE PREPAYMENTS (3)	12,188	(11,847)	341
4	MEMBERSHIP DUES (3)	300	(292)	8
5	GAS MBP INSURANCE (2)	10	-	10
6	ELECTRIC MBP INSURANCE (2)	77	(77)	-
7	POWER/CAPACITY PREPAID (2)	109	(109)	-
8	MEDICAL AND DENTAL VEBA (3)	4,844	(4,708)	136
9	GAS MEMBERSHIP DUES (2)	27	-	27
10	LOW INCOME WEATHERIZATION (2)	28	-	28
		<hr/>	<hr/>	<hr/>
11	TOTAL AVERAGE PREPAYMENTS	\$ 29,145	\$ (27,836)	\$ 1,309

12 (1) Reflects 13 month average

13 (2) Directly assigned to electric or gas.

14 (3) Allocated to gas based on operating expenses excluding purchased power, fuel adjustment clause and purchased gas.

PRO FORMA ADJUSTMENT

15	(1) Eliminate portions of prepayments which are applicable to electric operations. Amounts were either directly	<u>\$ (27,836)</u>
16	assigned to electric operations or were allocated between electric and gas operations based on operating	
17	expenses, excluding fuel and purchase power.	

AMEREN MISSOURI
TOTAL GAS CASH WORKING CAPITAL
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	REVENUE	EXPENSE	NET	<u>FACTOR</u> (E)	TEST YEAR	CASH WORKING
		<u>LAG</u> (B)	<u>LEAD</u> (C)	<u>LEAD/LAG</u> (D)		<u>EXPENSE</u> (F)	<u>CAPITAL REQUIREMENT</u> (G)
1	PAYROLL & WITHHOLDINGS	39.420	(10.900)	28.520	0.078137	\$ 20,864	\$ 1,630
2	PENSIONS AND BENEFITS	39.420	(15.700)	23.720	0.064986	(5,788)	(376)
3	OTHER EMPLOYEE BENEFITS	39.420	(17.650)	21.770	0.059644	2,740	163
4	FUEL	39.420	(39.420)	0.000	-	59,867	-
5	INCENTIVE COMPENSATION	39.420	(250.800)	(211.380)	(0.579123)	2,341	(1,356)
6	UNCOLLECTIBLE ACCOUNTS	39.420	(39.420)	0.000	-	1,245	-
7	OTHER OPERATING EXPENSES	39.420	(43.850)	(4.430)	(0.012137)	13,875	(168)
8							
9	TOTAL O&M EXPENSES					35,278	
10	TOTAL CASH WORKING CAPITAL REQUIREMENT						(107)
11	FICA - EMPLOYER'S PORTION	39.420	(9.380)	30.040	0.082301	1,136	93
12	FEDERAL UNEMPLOYMENT TAXES	39.420	(9.380)	30.040	0.082301	9	1
13	PROPERTY TAXES	39.420	(183.000)	(143.580)	(0.393370)	10,287	(4,047)
14	SALES TAXES	24.210	(4.500)	19.710	0.054000	3,739	202
15	SELF PROCURED INSURANCE TAX	39.420	(241.500)	(202.080)	(0.553644)	19	(11)
16	GROSS RECEIPTS TAXES	24.210	(26.140)	(1.930)	(0.005288)	7,052	(37)
17	TOTAL TAXES AND OTHER EXPENSES					22,242	
18	NET CUSTOMER SUPPLIED FUNDS						\$ (3,799)
19	NET CASH WORKING CAPITAL REQUIREMENT						\$ (3,906)

AMEREN MISSOURI
TOTAL GAS FEDERAL AND STATE INCOME TAX AND CITY EARNINGS TAX CASH REQUIREMENTS
AND INTEREST EXPENSE CASH REQUIREMENT
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>REVENUE</u> <u>LAG</u> (B)	<u>EXPENSE</u> <u>LEAD (1)</u> (C)	<u>NET</u> <u>LEAD/LAG</u> (D)	<u>FACTOR</u> (E)	<u>TEST YEAR</u> <u>EXPENSE</u> (F)	<u>CASH WORKING</u> <u>CAPITAL</u> <u>REQUIREMENT</u> (G)
1	FEDERAL INCOME TAX CASH REQUIREMENT	39.420	(38.000)	1.420	0.003890	\$ 7,188	<u>\$ 28</u>
2	STATE INCOME TAX CASH REQUIREMENT	39.420	(38.000)	1.420	0.003890	\$ 1,277	<u>\$ 5</u>
3	CITY EARNINGS TAX CASH REQUIREMENT	39.420	(274.500)	(235.080)	(0.644055)	\$ 23	<u>\$ (15)</u>
4	INTEREST EXPENSE CASH REQUIREMENT	39.420	(91.370)	(51.950)	(0.142329)	\$ 10,850	<u>\$ (1,544)</u>

AMEREN MISSOURI
TOTAL GAS AVERAGE CUSTOMER ADVANCES FOR CONSTRUCTION AND
AVERAGE CUSTOMER DEPOSITS
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTAL GAS</u> (B)
1	AVERAGE CUSTOMER ADVANCES FOR CONSTRUCTION	\$ <u>(598)</u>
2	AVERAGE CUSTOMER DEPOSITS	\$ <u>(1,595)</u>

**AMEREN MISSOURI
OTHER REGULATORY ASSETS
AND REGULATORY LIABILITIES
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)**

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTAL GAS (1)</u> (B)
1	PENSION TRACKER	<u>\$ (8,608)</u>
2	OTHER POST-EMPLOYMENT BENEFITS (OPEB) TRACKER	<u>\$ (2,556)</u>
3	PROPERTY TAX TRACKER	<u>\$ 4,390</u>
4	GAS PAYS PROGRAM	<u>\$ (576)</u>
5	EXPIRED & EXPIRING AMORTIZATIONS IN RATE BASE	<u>\$ 112</u>
6	(1) A positive balance is a Regulatory Asset and a negative balance is a	
7	Regulatory Liability.	

AMEREN MISSOURI
ACCUMULATED DEFERRED INCOME TAXES
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTAL GAS PER BOOKS</u> (B)	<u>PRO FORMA ADJUSTMENTS</u> (C)	<u>PRO FORMA GAS TOTAL</u> (D)
1	ACCOUNT 190	\$ 3,556	\$ 476	\$ 4,032
2	ACCOUNT 282	(82,344)	(2,740)	(85,084)
3	ACCOUNT 283	<u>(994)</u>	<u>(347)</u>	<u>(1,341)</u>
4	TOTAL ACCUMULATED DEFERRED INCOME TAXES	<u>\$ (79,782)</u>	<u>\$ (2,611)</u>	<u>\$ (82,393)</u>

PRO FORMA ADJUSTMENT:

5 Changes in balances from March 31, 2024 to December 31, 2024, which is the end of the true-up period.

AMEREN MISSOURI
TOTAL GAS PER BOOK AND PRO FORMA OPERATING REVENUES
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTAL GAS</u> (B)	<u>PRO FORMA ADJUSTMENTS</u> (C)	<u>ADJUSTED TOTAL GAS</u> (D)
OPERATING REVENUES				
1	RETAIL REVENUES	\$ 131,918	\$ (67,138)	\$ 64,780
2	TRANSPORTATION	13,211	221	13,432
3	PROVISION FOR RATE REFUNDS	(2,481)	2,481	-
4	OTHER GAS REVENUES	1,732	(5)	1,727
5	TOTAL REVENUES PER BOOKS	\$ 144,380	\$ (64,441)	\$ 79,939
PRO FORMA ADJUSTMENTS:				
6	(1) REMOVE ADD ON REVENUE TAX	(7,549)		
7	(2) ADJUSTMENT TO REFLECT NORMAL WEATHER	4,959		
8	(3) ELIMINATE PGA REVENUES	(68,504)		
9	(4) ADJUST FOR BILLING UNITS	(2,951)		
10	(5) ELIMINATE UNBILLED REVENUE	7,849		
11	(6) PAYS PROGRAM ADJUSTMENT	44		
12	(7) GROWTH ADJUSTMENT	555		
13	(8) DAYS & LEAP YEAR ADJUSTMENT	(1,277)		
14	(9) INTERCOMPAY FACILITY RENT ADJUSTMENT	(49)		
15	(10) PROVISION FOR RATE REFUNDS	2,481		
16	TOTAL PRO FORMA ADJUSTMENTS	\$ (64,442)		

AMEREN MISSOURI
GAS OPERATING AND MAINTENANCE EXPENSES
PER BOOK AND PRO FORMA
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

LINE	FUNCTIONAL CLASSIFICATION (A)	TOTAL PER BOOKS (B)	#1	#2	#3	#4	#5	#6	#7	#8
			LABOR ADJUSTMENT (C)	INCENTIVE COMPENSATN ADJUSTMENT (D)	LONG TERM INCENTIVE COMPENSATN ADJUSTMENT (E)	ANNUALIZE BAD DEBT EXPENSE (F)	PAYS PROGRAM AMORTIZATION (G)	STAFFING ANNUALIZATION ADJUSTMENT (H)	ELIMINATE PURCHASED GAS EXPENSE INCL PGA (I)	ADD INTEREST ON CUSTOMER DEPOSITS (J)
1	PRODUCTION:	\$ 60,729	\$ 36	\$ (6)	\$ (9)	\$ -	\$ -	\$ -	\$ (59,867)	\$ -
2	TRANSMISSION EXPENSES:	\$ 54	\$ 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3	DISTRIBUTION EXPENSES:	\$ 17,643	\$ 587	\$ (83)	\$ (121)	\$ -	\$ -	\$ -	\$ -	\$ -
4	CUSTOMER ACCOUNTS EXPENSES:	\$ 5,818	\$ 170	\$ (24)	\$ (27)	\$ (28)	\$ -	\$ -	\$ -	\$ 151
5	CUSTOMER SERV. & INFO. EXPENSES:	\$ 406	\$ 1	\$ -	\$ -	\$ -	\$ (48)	\$ -	\$ -	\$ -
6	SALES EXPENSES:	\$ 60	\$ 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7	ADMINISTRATIVE & GENERAL EXPENSES:	\$ 16,016	\$ 346	\$ (58)	\$ (436)	\$ -	\$ -	\$ (35)	\$ -	\$ -
8	TOTAL OPERATIONS & MAINTENANCE EXPENSES	\$ 100,726	\$ 1,144	\$ (171)	\$ (593)	\$ (28)	\$ (48)	\$ (35)	\$ (59,867)	\$ 151

9 **NOTE:** See SCHEDULE BMH-D11-4 for explanation of the pro forma adjustments.

AMEREN MISSOURI
GAS OPERATING AND MAINTENANCE EXPENSES
PER BOOK AND PRO FORMA
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

LINE	FUNCTIONAL CLASSIFICATION (A)	#9	#10	#11	#12	#13	#14	#15	#16	#17
		INSURANCE ADJUST. (B)	PRO FORMA MEDICAL & BENEFIT ADJUST. (C)	NON- QUALIFIED PENSION ADJUST. (D)	REBASE PENSION AND OPEB TRACKER (E)	AMORTIZE PENSION AND OPEB TRACKER (F)	ANNUALIZE DEPRECIATION AND RATE CASE EXPENSE (G)	INTERCOMPANY FACILITY RENT (H)	REMOVE ELECTRIC COSTS ALLOCATED TO GAS (I)	DEPR TO O&M ADJUSTMENT (J)
1	PRODUCTION:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	TOTAL TRANSMISSION EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3	DISTRIBUTION EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 69
4	CUSTOMER ACCOUNTS EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5	CUSTOMER SERV. & INFO. EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6	SALES EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7	ADMINISTRATIVE & GENERAL EXPENSES:	\$ 174	\$ 11	\$ 11	\$ (5,221)	\$ (1,793)	\$ 221	\$ 48	\$ (35)	\$ -
8	TOTAL OPERATIONS & MAINTENANCE EXPENSES	\$ 174	\$ 11	\$ 11	\$ (5,221)	\$ (1,793)	\$ 221	\$ 48	\$ (35)	\$ 69

9 NOTE: See SCHEDULE BMH-D11-4 for explanation of the pro forma adjustments.

AMEREN MISSOURI
GAS OPERATING AND MAINTENANCE EXPENSES
PER BOOK AND PRO FORMA
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

#18		#19	#20	#21	#22	#23	#24			
ALLOCATION FACTOR ADJUSTMENT (K)	LINE	FUNCTIONAL CLASSIFICATION (A)	BOARD OF DIRECTORS EXPENSE (B)	SOFTWARE RENTAL EXPENSE (C)	EV INCENTIVE ADJUSTMENT (D)	CUSTOMER CONVENIENCE FEES (E)	MPSC ASSESSMENT (F)	METER READS ADJUSTMENT (G)	TOTAL PRO FORMA ADJUSTMENT (H)	PRO FORMA GAS TOTALS (I)
\$ -	1	PRODUCTION:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	(59,846)	883
\$ -	2	TOTAL TRANSMISSION EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	2	56
\$ -	3	DISTRIBUTION EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	452	18,095
\$ -	4	CUSTOMER ACCOUNTS EXPENSES:	\$ -	\$ -	\$ -	719	\$ -	(125)	836	6,654
\$ -	5	CUSTOMER SERV. & INFO. EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	(47)	359
\$ -	6	SALES EXPENSES:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	2	62
\$ (66)	7	ADMINISTRATIVE & GENERAL EXPENSES:	\$ (34)	\$ -	\$ (4)	\$ -	21	\$ -	(6,850)	9,166
<u>\$ (66)</u>	8	TOTAL OPERATIONS & MAINTENANCE EXPENSES	<u>\$ (34)</u>	<u>\$ -</u>	<u>\$ (4)</u>	<u>\$ 719</u>	<u>\$ 21</u>	<u>\$ (125)</u>	<u>\$ (65,451)</u>	<u>\$ 35,275</u>

9 **NOTE:** See SCHEDULE BMH-D11-4 for explanation of the pro forma adjustments.

AMEREN MISSOURI
GAS OPERATING AND MAINTENANCE EXPENSE
PRO FORMA ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

PRO FORMA	TOTAL		
LINE	AMOUNT		
ITEM NO.	(C)		
(A)	(B)		
1	(1)	Increased labor expense from annualizing the average 3.56% wage increase for management employees effective January 1, 2024, the 3.50% wage increase for the Company's union employees effective January 1, 2024 per the labor contracts, annualizing an average 3.10% wage increase for management employees effective January 1, 2025, and the 3.10% wage increase for the Company's union employees effective January 1, 2025.	\$ 1,144
2			
3			
4			
5	(2)	Decrease incentive compensation expense for the incentive compensation applicable to AMS and Ameren Missouri officers that is based on the achievement of earnings-per-share (EPS) goals of the Company.	\$ (171)
6			
7	(3)	Eliminate the long-term incentive compensation expense that is based on the achievement of total shareholder return (TSR) goals of the Company.	\$ (593)
8			
9	(4)	Decrease in customer accounts expense to normalize bad debt expense.	\$ (28)
10	(5)	Decrease in customer service expense from PAYS program amortization.	\$ (48)
11	(6)	Decrease in administrative and general expense for staffing annualization of salary and benefits.	\$ (35)
12	(7)	Decrease in production expense to eliminate cost of purchased gas and other related costs and expenses that are collected through the PGA.	\$ (59,867)
13			
14	(8)	Increase in customer account expense to reflect interest expense at 9.5% on the average customer deposit balance.	\$ 151
15			
16	(9)	Annualize insurance expense based upon current insurance premiums.	\$ 174
17	(10)	Increase in administrative and general expense to reflect annualized major medical and other employee benefit expenses through December 31, 2024.	\$ 11
18			
19	(11)	Increase non-qualified pension expense to reflect current level of expense.	\$ 11
20	(12)	Rebase Pension and OPEB Tracker to true up level.	\$ (5,221)
21	(13)	Decrease in administrative and general expense to reflect an increase in the amortization of the net regulatory liabilities for the Pension and OPEB Tracker.	\$ (1,793)
22			
23	(14)	Increase in administrative and general expense to reflect the 3 case average of rate case and depreciation study expenses.	\$ 221
24			
25	(15)	Increase in administrative and general expense for building rent.	\$ 48
26	(16)	Decrease in administrative and general expense to remove electric costs allocated to gas.	\$ (35)
27	(17)	Increase distribution expenses for an increase in depreciation charged to O&M.	\$ 69
28	(18)	Decrease in administrative and general expense to utilize 2024 allocation factors.	\$ (66)
29	(19)	Decrease in administrative and general expense to remove certain Board of Director meeting expenses.	\$ (34)
30	(20)	Decrease in administrative and general expense for software rent.	\$ -
31	(21)	Decrease in administrative and general expense for the EV incentive program.	\$ (4)
32	(22)	Increase in customer accounts expense for customer convenience fees.	\$ 719
33	(23)	Increase in administrative and general expense to annualize current level of MPSC Assessment.	\$ 21
34	(24)	Decrease in customer accounts expense to reflect AMR cost savings.	\$ (125)
35		Total Pro Forma Adjustments to Gas Operating and Maintenance Expenses	\$ (65,451)

AMEREN MISSOURI
DEPRECIATION & AMORTIZATION EXPENSE
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTALS</u> <u>PER</u> <u>BOOKS (1)</u> (B)	<u>PRO FORMA</u> <u>ADJUSTMENTS (2)</u> (C)	<u>PRO FORMA</u> <u>GAS</u> <u>TOTALS</u> (D)
	DEPRECIATION EXPENSE:			
1	INTANGIBLE	1,136	5,579	6,715
2	PRODUCTION	-	-	-
3	TRANSMISSION PLANT	113	-	113
4	DISTRIBUTION PLANT	10,410	2,792	13,202
5	GENERAL PLANT	3,799	426	4,225
6	INCENTIVE COMPENSATION	-	(60)	(60)
7	TOTAL DEPRECIATION EXPENSE	<u>15,458</u>	<u>8,737</u>	<u>24,195</u>
	MISC. AMORTIZATION:			
8	AMORTIZATION OF AMI SOFTWARE	120	186	306
9	EXPIRED & EXPIRING AMORTIZATIONS	(146)	187	41
10	AMORTIZATION OF CRITICAL NEEDS	30	-	30
11	AMORTIZATION OF COVID AAO	6	33	39
12	AMORTIZATION OF EXCESS TRACKER	(156)	185	29
13	AMORTIZATION OF PROPERTY TAX TRACKER	-	1,463	1,463
14	TOTAL MISC AMORTIZATION	<u>(146)</u>	<u>2,054</u>	<u>1,908</u>
15	TOTAL DEPR & AMORTIZATION EXPENSE	<u>\$ 15,312</u>	<u>\$ 10,791</u>	<u>\$ 26,103</u>
16	(1) Includes the allocation of depreciation applicable to general plant.			

AMEREN MISSOURI
GAS DEPRECIATION & AMORTIZATION EXPENSE PRO FORMA ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>ITEM NO.</u>	<u>DESCRIPTION</u>	<u>PRO FORMA ADJUSTMENTS</u>
	(A)	(B)	(C)
1	(1)	To reflect the book depreciation annualized for the plant in service depreciable balances at	
2		March 31, 2024 and additions to plant in service from April 2024 through December 2024 to	
3		reflect the true-up.	
4		Change in Depr. Exp. - Production	\$ -
5		Change in Depr. Exp. - Transmission	-
6		Change in Depr. Exp. - Distribution	2,761
7		Change in Depr. Exp. - General Plant	1,379
8		Change in Depr. Exp. - Incentive Comp Capitalized	(60)
9		Change in Amort. Exp. - Intangible Plant	5,579
10		Total Increase in Depreciation Expense	<u>\$ 9,659</u>
11	(2)	To reflect change in depreciation rates per testimony of Gannett Fleming.	
12		Change in Depr. Exp. - Production	\$ -
13		Change in Depr. Exp. - Transmission	-
14		Change in Depr. Exp. - Distribution	31
15		Change in Depr. Exp. - General Plant	5
16		Change in Amort. Exp. - Intangible Plant	-
17		Total Increase in Depreciation Expense	<u>\$ 36</u>
18	(3)	To reduce depreciation expense charged to O&M	
19		Decrease in Depr. Exp. - General Plant	<u>\$ (959)</u>
20	(4)	Annualize the Amortization of AMI Software	<u>\$ 186</u>
21	(5)	To reflect Expired & Expiring Amortizations.	<u>\$ 187</u>
22	(6)	Amortization of COVID AAO	<u>\$ 33</u>
23	(7)	To eliminate accumulation and reflect annualized amortization of Excess Deferred Tracker.	<u>\$ 185</u>
24	(8)	To amortize Property Tax Tracker.	<u>\$ 1,463</u>
25	TOTAL PRO FORMA ADJUSTMENTS: DEPRECIATION & AMORTIZATION		<u>\$ 10,790</u>

AMEREN MISSOURI
TAXES OTHER THAN INCOME TAXES
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>TOTAL PER BOOKS</u> (B)	<u>PRO FORMA ADJUSTMENTS(1)</u> (C)	<u>PRO FORMA GAS TOTALS</u> (D)
	PAYROLL TAXES			
1	F.I.C.A.	\$ 1,111	\$ 26	\$ 1,137
2	FEDERAL UNEMPLOYMENT	9	-	9
3	TOTAL PAYROLL TAXES	<u>1,120</u>	<u>26</u>	<u>1,146</u>
	PROPERTY TAX			
4	MISSOURI R.E., & P.P.	9,535	420	9,955
5	OTHER STATES R.E. & P.P.	486	(154)	332
6	TOTAL R.E., P.P. & CORP FRANCHISE	<u>10,021</u>	<u>266</u>	<u>10,287</u>
7	MUNICIPAL GROSS RECEIPTS	7,052	(7,052)	-
	MISCELLANEOUS			
8	MISSOURI CORP FRANCHISE	18	-	18
9	TOTAL MISCELLANEOUS	<u>18</u>	<u>-</u>	<u>18</u>
10	TOTAL TAXES OTHER THAN INCOME TAXES	<u>\$ 18,211</u>	<u>\$ (6,760)</u>	<u>\$ 11,451</u>
11	(1) See SCHEDULE BMH-D13-2 for explanation of the pro forma adjustments.			

**AMEREN MISSOURI
TAXES OTHER THAN INCOME
PRO FORMA ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)**

<u>LINE</u>	<u>ITEM NO.</u> (A)	<u>DESCRIPTION</u> (B)	<u>PRO FORMA AMOUNT</u> (C)
1	(1)	Increase the F.I.C.A. taxes to reflect the pro forma wage adjustments.	\$ 26
2	(2)	Property tax true-up adjustment.	\$ 266
3	(3)	Eliminate the gross receipts tax as they are a pass through tax.	\$ (7,052)
4		Total Pro Forma Adjustments to Taxes Other Than Income	\$ (6,760)

AMEREN MISSOURI
TOTAL GAS INCOME TAXES AT THE PROPOSED RETURN
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u>	<u>(B)</u>	<u>TOTAL GAS (C)</u>
	(A)		
1	TOTAL GAS NET INCOME FROM OPERATIONS		\$ 39,252
	ADD		
2	CURRENT INCOME TAXES		8,488
3	DEFERRED INCOME TAXES		
4	DEFERRED INCOME TAX EXPENSE		(971)
5	I.T.C. AMORTIZATION		(17)
6	TOTAL GAS NET INCOME BEFORE INCOME TAX		46,752
	ADDITIONS TO NET INCOME BEFORE INCOME TAX		
7	BOOK DEPRECIATION		26,105
8	BOOK DEPRECIATION CHARGED TO O&M		959
9	EQUITY ISSUANCE COSTS		-
10	TOTAL ADDITIONS		27,064
	SUBTRACTIONS TO NET INCOME BEFORE INCOME TAX		
11	INTEREST ON DEBT (1)		10,850
12	TAX STRAIGHT LINE		27,435
13	PREFERRED DIVIDEND DEDUCTION		-
14	TOTAL SUBTRACTIONS		38,285
15	TOTAL GAS NET TAXABLE INCOME		35,531
	FEDERAL INCOME TAX		
16	NET TAXABLE INCOME		35,531
17	DEDUCT MISSOURI INCOME TAX		1,278
18	DEDUCT CITY EARNINGS TAX		23
19	FEDERAL TAXABLE INCOME		34,230
20	FEDERAL INCOME TAX	21.00%	7,188
	STATE INCOME TAXES		
21	NET TAXABLE INCOME		35,531
22	DEDUCT 50% OF FEDERAL INCOME TAX		3,594
23	DEDUCT CITY EARNINGS TAX		23
24	MISSOURI TAXABLE INCOME		31,914
25	TOTAL GAS MISSOURI INCOME TAX	4.00%	1,278
	CITY EARNINGS TAX		
26	NET TAXABLE INCOME		35,531
27	LESS TAX ADJUSTMENTS TO INCOME		(11,262)
28	CITY TAXABLE INCOME		24,269
29	CITY EARNINGS TAX	0.0955%	23
30	TOTAL GAS CURRENT INCOME TAXES		8,489
	DEFERRED INCOME TAXES:		
31	DEFERRED INCOME TAX EXPENSE		(971)
32	I.T.C. AMORTIZATION		(17)
33	TOTAL GAS DEFERRED INCOME TAX		(988)
34	TOTAL GAS CURRENT & DEFERRED INCOME TAX		\$ 7,501
35	(1) RATE BASE X EMBEDDED		
36	COST OF DEBT.	2.045%	

AMEREN MISSOURI
TOTAL GAS NET ORIGINAL COST RATE BASE AND REVENUE REQUIREMENT
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

<u>LINE</u>	<u>DESCRIPTION</u> (A)	<u>REFERENCE</u> (B)	<u>TOTAL GAS AMOUNT</u> (C)
A. TOTAL GAS NET ORIGINAL COST RATE BASE			
1	ORIGINAL COST OF PLANT IN SERVICE	SCHEDULE BMH-D1	\$ 900,917
2	LESS: RESERVES FOR DEPRECIATION & AMORTIZATION	SCHEDULE BMH-D2	282,778
3	NET ORIGINAL COST OF PLANT		618,139
4	AVERAGE FUEL AND MATERIALS AND SUPPLIES	SCHEDULE BMH-D3	8,383
5	AVERAGE PREPAYMENTS	SCHEDULE BMH-D4	1,309
6	CASH WORKING CAPITAL (LEAD/LAG)	SCHEDULE BMH-D5	(3,906)
7	FEDERAL INCOME TAX CASH REQUIREMENT	SCHEDULE BMH-D6	28
8	STATE INCOME TAX CASH REQUIREMENT	SCHEDULE BMH-D6	5
9	CITY EARNINGS TAX CASH REQUIREMENT	SCHEDULE BMH-D6	(15)
10	INTEREST EXPENSE CASH REQUIREMENT	SCHEDULE BMH-D6	(1,544)
11	AVERAGE CUSTOMER ADVANCES FOR CONSTRUCTION	SCHEDULE BMH-D7	(598)
12	AVERAGE CUSTOMER DEPOSITS	SCHEDULE BMH-D7	(1,595)
13	PENSION TRACKER REG ASSET	SCHEDULE BMH-D8	(8,608)
14	OPEB TRACKER REG LIABILITY	SCHEDULE BMH-D8	(2,556)
15	PROPERTY TAX TRACKER	SCHEDULE BMH-D8	4,390
16	GAS PAYS PROGRAM	SCHEDULE BMH-D8	(576)
17	EXPIRED & EXPIRING AMORTIZATIONS IN RATE BASE	SCHEDULE BMH-D8	112
18	ACCUMULATED DEFERRED INCOME TAXES	SCHEDULE BMH-D9	(82,393)
19	TOTAL GAS NET ORIGINAL COST RATE BASE		\$ 530,575
B. TOTAL GAS REVENUE REQUIREMENT			
TOTAL GAS OPERATING EXPENSES:			
20	PRODUCTION	SCHEDULE BMH-D11-3	\$ 886
21	TRANSMISSION	SCHEDULE BMH-D11-3	56
22	DISTRIBUTION	SCHEDULE BMH-D11-3	18,095
23	CUSTOMER ACCOUNTS	SCHEDULE BMH-D11-3	6,654
24	CUSTOMER SERVICE	SCHEDULE BMH-D11-3	359
25	SALES	SCHEDULE BMH-D11-3	62
26	ADMINISTRATIVE AND GENERAL	SCHEDULE BMH-D11-3	9,166
27	TOTAL GAS OPERATING EXPENSES		35,278
28	DEPRECIATION AND AMORTIZATION	SCHEDULE BMH-D12-1	26,103
29	TAXES OTHER THAN INCOME TAXES	SCHEDULE BMH-D13-1	11,451
INCOME TAXES-BASED ON PROPOSED RATE OF RETURN			
30	FEDERAL	SCHEDULE BMH-D14	7,188
31	STATE	SCHEDULE BMH-D14	1,278
32	CITY EARNINGS	SCHEDULE BMH-D14	23
33	TOTAL INCOME TAXES		8,489
DEFERRED INCOME TAXES			
34	DEFERRED INCOME TAX EXPENSE	SCHEDULE BMH-D14	(971)
35	I.T.C. AMORTIZATION	SCHEDULE BMH-D14	(17)
36	TOTAL DEFERRED INCOME TAXES		(988)
37	RETURN (RATE BASE * 7.398%)	7.398%	39,252
38	TOTAL GAS REVENUE REQUIREMENT		\$ 119,585

AMEREN MISSOURI
INCREASE REQUIRED TO PRODUCE 7.398% RETURN ON
TOTAL GAS NET ORIGINAL COST RATE BASE
FOR THE TWELVE MONTHS ENDED MARCH 31, 2024
(\$000)

LINE	DESCRIPTION (A)	TOTAL GAS AMOUNT (B)
1	TOTAL GAS NET ORIGINAL COST RATE BASE	\$ 530,575
	TOTAL GAS REVENUE REQUIREMENT:	
2	RETURN AT PROPOSED RATE (7.398%)	39,252
3	OPERATING AND MAINTENANCE EXPENSES	35,278
4	DEPRECIATION AND AMORTIZATION	26,103
5	TAXES OTHER THAN INCOME	11,451
6	FEDERAL AND STATE INCOME AND CITY EARNINGS TAXES AT CLAIMED RETURN	8,489
7	DEFERRED INCOME TAXES	(988)
8	TOTAL GAS REVENUE REQUIREMENT	119,585
9	PRO FORMA TOTAL GAS OPERATING REVENUE AT PRESENT RATES	79,938
10	DEFICIENCY IN TOTAL GAS OPERATING REVENUE	\$ 39,647

Ameren Missouri
Cash Working Capital Requirement
For the Twelve Months Ended December 31, 2020

Line No.	Description (A)	Revenue Lag (B)	Expense Lead (C)	Net Lag (D)	CWC Factor (E)
1	Pensions & OPEBS	39.42	(15.70)	23.72	0.0650
2	Employee Benefits (Group Health & 401k)	39.42	(17.65)	21.77	0.0596
3	Payroll and Withholdings	39.42	(10.90)	28.52	0.0781
4	Payroll Taxes	39.42	(9.38)	30.04	0.0823
5	Other Operations and Maintenance Expenses	39.42	(43.85)	(4.43)	(0.0121)
6	Property/Real Estate Taxes	39.42	(183.00)	(143.58)	(0.3934)
7	Missouri Sales Tax	24.21	(4.50)	19.71	0.0540
8	Gross Receipts Taxes	24.21	(26.14)	(1.93)	(0.0053)
9	Federal Income Tax	39.42	(38.00)	1.42	0.0039
10	State Income Tax	39.42	(38.00)	1.42	0.0039
11	St Louis Corporate Earnings Tax	39.42	(274.50)	(235.08)	(0.6441)
12	PGA Expense	39.42	(39.42)	-	0.0000
13	Interest Expense	39.42	(91.37)	(51.95)	(0.1489)
14	Uncollectible Expense	39.42	(39.42)	-	0.0000
15	Self Procured Insurance Tax	39.42	(241.50)	(202.08)	(0.5536)
16	Incentive Compensation	39.42	(250.80)	(211.38)	(0.5791)

**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) File No.: GR-2024-0369
Revenues for Natural Gas Service.)

AFFIDAVIT OF BENJAMIN HASSE

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Benjamin Hasse, being first duly sworn on his oath, states:

My name is Benjamin Hasse, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Benjamin Hasse
Benjamin Hasse

Sworn to me this 27th day of September, 2024.