

Exhibit No. 250

Exhibit No.:
Issue(s): Revenue Requirement
Witness: Lisa M. Ferguson
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GR-2021-0241
Date Testimony Prepared: October 15, 2021

MISSOURI PUBLIC SERVICE COMMISSION
FINANCIAL AND BUSINESS ANALYSIS DIVISION
AUDITING DEPARTMENT

REBUTTAL TESTIMONY

OF

LISA M. FERGUSON

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

CASE NO. GR-2021-0241

Jefferson City, Missouri
October 2021

1 REBUTTAL TESTIMONY

2 OF

LISA M. FERGUSON

3 UNION ELECTRIC COMPANY

4 d/b/a Ameren Missouri

5 CASE NO. GR-2021-0241

6 Q. Please state your name and business address.

7 A. Lisa M. Ferguson, 111 N. 7th Street, Suite 105, St. Louis, MO 63101.

8 Q. By whom are you employed?

9 A. I am employed by the Missouri Public Service Commission ("Commission") as
10 a member of the Auditing Staff ("Staff").

11 Q. Are you the same Lisa M. Ferguson who filed Direct Testimony and contributed
12 to Staff's *Revenue Requirement Cost of Service Report* filed September 3, 2021 in this case?

13 A. Yes, I am.

14 Q. What is the purpose of your rebuttal testimony in this proceeding?

15 A. My rebuttal testimony will update the Commission regarding a change in Staff's
16 revenue requirement position from direct after inclusion of a few error corrections and a change
17 in revenue position.

18 Q. What was Staff's revenue requirement for Ameren Missouri's gas operations in
19 direct testimony?

20 A. Staff's revenue requirement was \$3,834,752.

21 Q. Please explain the error corrections that were necessary.

Rebuttal Testimony of
Lisa M. Ferguson

1 A. Staff has corrected errors in four areas of its filed direct position in the current
2 gas case. Staff:

- 3 • Corrected the adjustment related to removal of capitalized operations &
4 maintenance (O&M) depreciation;
- 5 • Included an adjustment to remove the allocated test year company owned life
6 insurance (COLI) gains, losses and premiums for gas operations;
- 7 • Corrected the adjustment to standard transportation and interruptible revenue;
- 8 • Included an adjustment to remove the amortization allocated to gas operations
9 relating to capital costs associated with Ameren Missouri's paperless billing
10 option per agreement of all parties in Ameren Missouri's last electric rate case.
11 Staff had included an adjustment to remove the capital investment related to
12 paperless billing in its direct filing. However, Staff erroneously omitted
13 inclusion of an adjustment to remove the associated amortization of that
14 investment needed for Ameren Missouri's paperless billing program.

15 As part of the Corrected Stipulation & Agreement in Case No. ER-2019-0335, Section 47 states:

16 The Signatories agree that Ameren Missouri may implement its
17 paperless bill credit proposal as outlined in the Direct Testimony
18 of Mark Birk. The Company shall exclude bill credits from
19 revenues used to determine the revenue requirement in its next
20 rate case. Ameren Missouri shall not seek recovery for any
21 incentives or other costs directly associated with paperless
22 billing.

23 Q. Has Staff proposed any further changes to its direct accounting schedules for gas
24 operations?

25 A. Yes. Staff has included an adjustment proposed by Staff witness Joel McNutt
26 regarding the impact COVID-19 has had on the revenue of one of Ameren Missouri's special

Rebuttal Testimony of
Lisa M. Ferguson

1 contract customers. Please see this Staff witness' rebuttal testimony for further discussion on
2 this matter.

3 Q. After these corrections and revenue adjustment, what is Staff's current revenue
4 requirement for Ameren Missouri's gas operations?

5 A. Staff's revenue requirement is currently \$4,124,441 prior to Staff's true-up
6 audit.

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust Its)
Revenues for Natural Gas Service) Case No. GR-2021-0241

AFFIDAVIT OF LISA M. FERGUSON

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

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

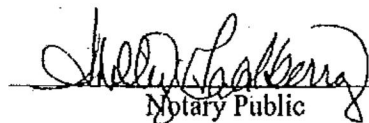
Further the Affiant sayeth not.



LISA M. FERGUSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of St. Louis, State of Missouri, at my office in St. Louis, on this 14 day of October 2021.



Notary Public

