

Exhibit No.:

Issue(s): Payroll, Payroll Taxes,
Other Benefits, Non-
Labor Power Plant
Maintenance, Severance,
Pensions & OPEBs,
SERP, MEEIA Test Year
Removals, Incentive
Compensation, PISA,
Allocations, Callaway
Refuel, Intercompany
Building Rental Expense

Witness: Jane C. Dhority

Sponsoring Party: MoPSC Staff

Type of Exhibit: Direct Testimony

Case No.: ER-2024-0319

Date Testimony Prepared: December 3, 2024

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

JANE C. DHORITY

**UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri**

CASE NO. ER-2024-0319

*Jefferson City, Missouri
December 2024*

**** Denotes Confidential Information ****

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JANE C. DHORITY
UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri
CASE NO. ER-2024-0319**

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1 A. Staff recommends including an annualized level of payroll expense for contract
2 and management employees which includes a wage increase that became effective on
3 January 1, 2024.¹ Staff also adjusted payroll expense to reflect changes in employee levels
4 through June 30, 2024.

5 Q. Does Staff recommend an adjustment to payroll taxes?

6 A. Yes. Staff recommends annualizing payroll taxes by applying the current
7 Federal Insurance Contributions Act (“FICA”), Federal Unemployment Tax Act (“FUTA”),
8 and State Unemployment Tax Act (“SUTA”) tax rates to the annualized payroll amount as of
9 June 30, 2024.

10 Q. Will these items be addressed as part of Staff’s true-up audit?

11 A. Yes. Staff will recommend true-up adjustments to include changes in staffing
12 levels at the December 31, 2024, true-up cutoff date, as well as wage increases for contract and
13 management employees expected to take effect January 1, 2025. Staff will also recalculate
14 payroll taxes based on annualized payroll through the December 31, 2024, true-up cutoff date.
15 This treatment is consistent with Staff’s approach in past Ameren Missouri rate cases.

16 **OTHER BENEFITS (OTHER THAN PENSIONS AND OPEBS)**

17 Q. What are other benefits?

18 A. Ameren Missouri provides benefits to both current and former employees.
19 These benefits include: medical, dental, and vision insurance; 401(k); pensions and OPEBs.

¹ For the purposes of calculating the annualized effect of the wage increases, Staff removed all incentive compensation and bonus payments from the test year payroll expense in order to isolate base payroll expense before applying the wage increases.

1 This section pertains to benefits for current employees. Pensions and OPEBs (benefits offered
2 to qualifying former employees) are addressed further in this testimony.

3 Q. What is Staff's recommendation regarding other benefits?

4 A. Staff recommends annualizing other benefits expense based upon actual benefits
5 expense levels at June 30, 2024. Staff will reexamine these costs as part of its true-up audit.

6 **SEVERANCE EXPENSE**

7 Q. What is severance expense?

8 A. Severance payments are compensation awards provided to qualifying employees
9 who are involuntarily terminated from their jobs.

10 Q. Were there any severance payments made during the twelve (12) months ending
11 March 31, 2024?

12 A. Yes, severance payments were made to six employees during the test year.

13 Q. What is Staff's recommendation regarding severance costs?

14 A. Staff reviewed severance payments made during the test year and found that
15 Ameren Missouri has recognized and will continue to recognize costs savings through
16 regulatory lag from each employee's respective separation date until new rates take effect in
17 this case. Staff recommends an adjustment to remove severance payments made during the test
18 year as they are not recurring costs and should not be borne by ratepayers. Staff will revisit this
19 issue as part of its true-up audit.

20 **PENSIONS AND OPEBS**

21 **Pensions**

22 Q. What are pensions?

1 A. Pensions are a form of employee retirement plan that offers payments to
2 employees upon meeting the plan criteria for retirement.

3 Q. What pension plans are offered by Ameren Missouri?

4 A. Ameren Missouri offers a qualified pension plan called the Ameren Retirement
5 Plan, and a non-qualified pension plan called the Ameren Supplemental Retirement Program.

6 See below for discussion of Ameren's supplemental pension plan.

7 Q. Are Ameren Missouri's pension cost subject to a tracking mechanism?

8 A. Yes. The difference between actual pension expense and the amount of pension
9 expense included in Ameren Missouri's revenue requirement are tracked. Amounts that are
10 over-collected are refunded to customers and amounts that are under-collected are recovered
11 by Ameren Missouri through an amortization.

12 Q. What adjustments does Staff recommend pertaining to pensions?

13 A. First, the unamortized balance of any pension asset or liability is recalculated
14 with a new amortization period going forward. Second, an expected amount of current pension
15 expense is calculated to be included in Ameren Missouri's revenue requirement. Third, the
16 balance of the pension regulatory asset or liability is included in rate base.

17 Q. How many pension tracker layers does Ameren Missouri have at this time?

18 A. Ameren Missouri currently has six prior rate case pension tracker layers in
19 addition to the current layer.

20 Q. How did Staff address Ameren Missouri's various tracker layers?

1 A. Staff removed test year amortization balances for the five oldest tracker layers
2 which are to be included in expired and expiring amortizations.² Staff then updated the balance
3 in the pension tracker layer that began amortizing on the effective date of rates in Ameren
4 Missouri's most recently completed general rate case, Case No. ER-2022-0337, through the
5 June 30, 2024, update cutoff in this case. Staff calculated an annualized amount of amortization
6 expense pertaining to Ameren Missouri's current pension as of the update period ending
7 June 30, 2024. The sum of the pension tracker balances as of June 30, 2024, for the current
8 layer and the layer created in Case No. ER-2022-0337 results in a regulatory liability, therefore,
9 Staff included the balances as a reduction to rate base.

10 Q. How did Staff determine the amount of ongoing pension expense to include in
11 Ameren Missouri's revenue requirement in this case?

12 A. Staff reviewed the actuarial calculations of the current pension expense for
13 service and non-service costs that were included in Ameren Missouri's Adjustment 39
14 workpaper and reflected the Ameren Missouri's adjustment in Staff's accounting schedules.

15 Q. Will pensions be included in Staff's true-up audit in this case?

16 A. Yes.

17 **OPEBs**

18 Q. What are OPEBs?

19 A. OPEBs are costs incurred by Ameren Missouri to provide certain retirement
20 benefits to retirees; primarily medical insurance.

21 Q. Are Ameren Missouri's OPEB costs subject to a tracking mechanism?

² See Staff witness Lisa M. Ferguson's direct testimony for discussion of expired and expiring amortization adjustments.

1 A. Yes. Similar to pension costs, the difference between actual OPEB expense and
2 the amount of OPEB expense included in Ameren Missouri's revenue requirement are tracked.
3 Amounts that are over-collected are refunded to customers and amounts that are under-collected
4 are recovered by Ameren Missouri through an amortization.

5 Q. What adjustments does Staff recommend pertaining to OPEBs?

6 A. First, the unamortized balance of any OPEB asset or liability is recalculated with
7 a new amortization period going forward. Second, an expected amount of current OPEB
8 expense is calculated to be included in Ameren Missouri's revenue requirement. Third, the
9 balance of the OPEB regulatory asset or liability is included in rate base.

10 Q. How many OPEB tracker layers does Ameren Missouri have at this time?

11 A. Ameren Missouri currently has six prior rate case OPEB tracker layers in
12 addition to the current layer.

13 Q. How did Staff address Ameren Missouri's various tracker layers?

14 A. Staff removed test year amortization balances for the five oldest tracker layers
15 which are to be included in expired and expiring amortizations.³ Staff then updated the balance
16 in the OPEB tracker layer that began amortizing on the effective date of rates in Ameren
17 Missouri's most recently completed general rate case, Case No. ER-2022-0337, through the
18 June 30, 2024, update cutoff in this case. Staff calculated an annualized amount of amortization
19 expense pertaining to the Ameren Missouri's current OPEBs as of the update period ending
20 June 30, 2024. The sum of the OPEB tracker balances as of June 30, 2024, for the current layer

³ See Staff witness Lisa M. Ferguson's direct testimony for discussion of expired and expiring amortization adjustments.

1 and the layer created in Case No. ER-2022-0337 results in a regulatory liability, therefore, Staff
2 included the balances as a reduction to rate base.

3 Q. How did Staff determine the amount of ongoing OPEB expense to include in
4 Ameren Missouri's revenue requirement in this case?

5 A. Staff reviewed the actuarial calculations of the current OPEB expense for service
6 and non-service costs that were included in Ameren Missouri's Adjustment 39 workpaper and
7 reflected the Company's adjustment in Staff's accounting schedules.

8 Q. Will OPEBs be included in Staff's true-up audit in this case?

9 A. Yes.

10 **SUPPLEMENTAL EXECUTIVE RETIREMENT PLAN**

11 Q. What is a SERP?

12 A. SERP is a non-qualified pension plan offered to executive officers and other
13 highly-compensated former employees by Ameren Missouri. SERP provides additional
14 retirement benefits that these individuals would have received under other company pension
15 plans, but for compensation and benefit limits imposed by the Internal Revenue Service
16 ("IRS").

17 This plan is unfunded and the plan benefit payments are made either in a lump sum or
18 an annuity. Non-qualified pension expense is not included in Ameren Missouri's tracking
19 mechanism nor in the cost of service, as the amount provided by Ameren Missouri's actuary is
20 merely an estimate, not actual cash expense.

21 Q. What is Staff's recommendation for Ameren Missouri's SERP expense?

22 A. Staff has consistently reflected an amount of SERP based on cash payments.
23 To keep in line with Staff's approach in Ameren Missouri's prior rate cases including Case

1 Nos. ER-2021-0240 and ER-2022-0337, Staff recommends setting a normalized amount of
2 SERP expense based on a three-year average of historical lump-sum and annuity payment
3 amounts.

4 **INCENTIVE COMPENSATION**

5 Q. What is incentive compensation?

6 A. Incentive compensation is a variable component of an employee's compensation
7 that rewards them for achieving specific goals or objectives.

8 Q. What types of incentive compensation does Ameren Missouri offer to
9 its employees?

10 A. Ameren Missouri offers a short-term incentive plan ("STIP"), a long-term
11 incentive plan ("LTIP") and exceptional performance bonuses ("EPB").

12 **Short-Term Incentive Plan**

13 Q. Please describe Ameren Missouri's STIP.

14 A. ** [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED] ** .

20 Q. How did Staff evaluate short-term incentive compensation expense in this case?

21 A. Staff relied upon the guidance provided by the Commission in Case No.
22 EC-87-114:

1 At a minimum, an acceptable management performance plan should
2 contain goals that improve existing performance and the benefits of the
3 plan should be ascertainable and reasonably related to the plan.⁴

4 The Commission provided additional guidance in Case No. ER-2006-0314:

5 ... [M]aximizing [Earnings Per Share] could compromise service to
6 ratepayers, such as by reducing customer service or tree trimming costs,
7 the ratepayers should not have to bear that expense.

8 Q. Does Staff recommend an adjustment to Ameren Missouri's short-term
9 incentive compensation expense?

10 A. Yes. Staff recommends an adjustment to remove STIP amounts awarded for
11 earnings-based metrics.

12 **Long-Term Incentive Plan**

13 Q. What is long-term incentive compensation?

14 A. Long-term incentive pay is a strategy that rewards employees for achieving
15 goals over a period of time, usually more than one year.

16 Q. How is Ameren Missouri's long-term incentive compensation provided?

17 A. LTIP awards are provided in the form of Ameren Corporation common stock.

18 Q. Why does Ameren offer this plan to eligible officers and leadership?

19 A. According to the 2023 and 2024 Ameren Missouri Long-Term Incentive
20 Program plan documents provided in response to Staff Data Request No. 22, ** [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

⁴ Mo. P.S.C. (N.S.) 313, 325, (1987).

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED] ** .⁵

5 Q. Does Ameren Missouri require and/or encourage its leaders and officers to own
6 Ameren Corporation stock?

7 A. ** [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] **.

12 Q. How did Staff evaluate Ameren Missouri's long-term incentive compensation?

13 A. Staff used the same guidance provided by the Commission as it applied to
14 Ameren Missouri's short-term incentive compensation.⁶

15 Q. Does Staff recommend adjustments to LTIP in this case?

16 A. Yes. Staff recommends removing all long-term incentive compensation expense
17 from rates in this case.

18 Q. Why does Staff recommend exclusion of this expense?

19 A. Ownership of Ameren Corporation common stock creates a common interest
20 between Ameren Missouri's eligible officers and ALT and Ameren shareholders, which is to

⁵ Staff Data Request No. 0656

⁶ See above section pertaining to Ameren's STIP for references to Commission guidance.

1 increase the value of Ameren stock. As this is a shareholder benefit, the cost should not be
2 borne by Ameren Missouri electric ratepayers.

3 **Exceptional Performance Bonus**

4 Q. What are exceptional performance bonuses?

5 A. In addition to Ameren Missouri’s short-term and long-term incentive programs,
6 Ameren Missouri has a third program called the Exceptional Performance Bonus (“EPB”)
7 Program. ** [REDACTED]

8 [REDACTED]

9 [REDACTED] **.7

10 Q. Does Staff recommend an adjustment to EPB expense in this case?

11 A. Yes. Consistent with Staff’s approach in Case No. ER-2022-0337,
12 Staff recommends including a normalized level of EPB expense based on a three-year average
13 of EPB awards. The average included by Staff in this direct filing reflects payouts made during
14 the calendar years 2019, 2021 and 2022. Staff will revisit this issue as part of its true-up audit
15 and will update the three-year average to reflect the most recent three calendar years of payouts.

16 **NON-LABOR POWER PLANT MAINTENANCE EXPENSE**

17 Q. What did Staff’s audit of non-labor power plant maintenance entail?

18 A. Staff reviewed Ameren Missouri’s historical non-labor power plant maintenance
19 costs, including the costs of major outages for Ameren Missouri’s steam, combustion turbine
20 generator, and hydroelectric power plants.

21 Q. What is Staff’s recommendation regarding power plant maintenance expense?

⁷ Staff Data Request No. 0311

1 A. For Ameren Missouri’s Labadie and Sioux Energy Centers, Staff recommends
2 including an ongoing level of maintenance expense based on a six-year average ending on
3 June 30, 2024.

4 Q. Does Staff have further comments pertaining to its adjustment to steam
5 plant maintenance?

6 A. Yes. There is a difference between Staff and Ameren Missouri’s adjustment
7 pertaining to steam plant maintenance. The variation does not pertain to a position difference,
8 rather, it is due to normalization periods used. Ameren Missouri’s adjustment used 12-months
9 ending in March 2024 for its annualization, while Staff used 12-months ending in May 2024.⁸
10 Staff anticipates that this difference will disappear at true-up.

11 **MEEIA TEST YEAR EXPENSE REMOVALS**

12 Q. What is MEEIA?

13 A. MEEIA was established in Senate Bill 376 and became law on August 28, 2009.
14 Under this Act, the Missouri Public Service Commission is authorized to approve Demand Side
15 Investment Mechanisms (“DSIM”) for the state’s utilities and to allow cost-recovery,
16 lost revenue recovery and incentive mechanisms to make the utility whole for the operation of
17 those programs.

18 Q. What is Staff’s recommendation regarding MEEIA expenses?

19 A. Due to the ongoing use of Ameren Missouri’s DSIM rider, Staff removed all
20 MEEIA-related expenses (including incremental labor expense) from the test year to avoid
21 double counting for purposes of rate recovery.

⁸ Staff’s adjustment is based on data through May 2024 as Ameren did not provide maintenance information through the June 30, 2024, update cutoff date.

1 **PLANT-IN-SERVICE ACCOUNTING**

2 Q. What is plant-in-service accounting?

3 A. On June 1, 2018, Senate Bill 564 was signed into law. Under Section 393.1400
4 of the bill, investor-owned electric utilities in Missouri are given the option of deferring 85%
5 of all depreciation expense and return associated with qualifying electric plant that was recorded
6 to plant-in-service as a regulatory asset on or after the date the utility elects the PISA option.
7 Qualifying plant for the purposes of PISA consists of all rate base additions that are not new
8 nuclear, coal, or gas-fired generation or rate-base additions that increase revenues by allowing
9 service to new customers. During a general rate case after an electric utility's PISA election,
10 the regulatory asset must be amortized over 20 years and the unamortized balance is to be
11 included in rate base and allowed to earn a return. Any utility that chooses the PISA deferral
12 must file a five-year capital investment plan with the Commission annually, and the plan must
13 contain specific capital investment detailed within the plan, following the election of PISA.
14 In the years after filing the first capital investment plan, the utility must submit a report detailing
15 the actual capital investment from the prior year. At least 25% of the capital investment
16 included in the plan must be designated for grid modernization projects, and during the first
17 five years smart meter investment is limited to 6%.

18 Q. Does PISA have any limitations?

19 A. Yes. PISA remains in effect until December 31, 2033. Electric utilities may
20 request the Commission approve a five-year continuation prior to the cutoff date of
21 December 31, 2033. Any balances that remain after the PISA option has expired would
22 continue to be amortized and recovered through base rates by the utility. Ameren Missouri
23 received approval from the Commission for a Renewable Energy Standard Rate Adjustment

1 Mechanism (“RESRAM”). RESRAM-eligible investment must first pass through the PISA
2 mechanism and then Ameren Missouri may recover depreciation expense and return associated
3 with Renewable Energy Standard (“RES”) projects recorded on the utility’s books as permitted
4 by the RES statute, less the 85% of the expense and return deferred for future recovery pursuant
5 to the PISA statute.⁹

6 Q. Did Ameren Missouri elect to use PISA?

7 A. Yes. On September 1, 2018, Ameren Missouri filed its election to use PISA as
8 part of Case No. EO-2019-0044. Ameren Missouri submitted its five-year capital investment
9 plan on February 14, 2019, and has submitted subsequent yearly plans and reports in
10 compliance with PISA. During the Ameren Missouri’s rate Case No. ER-2019-0335,
11 a regulatory asset was established for PISA accumulations from September 1, 2018, to
12 December 31, 2019, with the asset being amortized over a 20-year period ending May, 31, 2040.
13 During Ameren Missouri’s rate Case No. ER-2021-0240, a regulatory asset was established for
14 PISA accumulations from January 1, 2020, through September 30, 2021, with that asset being
15 amortized over twenty years ending March 31, 2042. During Ameren Missouri’s most recently
16 completed general rate Case No. ER-2022-0337, a regulatory asset was established for PISA
17 accumulations from October 1, 2021, to December 31, 2022, to be amortized over 20 years
18 ending on February 28, 2040.

19 Q. How did Staff approach PISA in this rate case?

20 A. Staff has reviewed the costs that were included in the regulatory asset for the
21 period of January 1, 2023, through June 30, 2024. Staff has determined that the amounts
22 included in the PISA deferral are in compliance with the statutes, and has included them in the

⁹ Report and Order, case No. EA-2018-0202, pg. 11

1 deferred asset. Staff included a 20-year amortization of the PISA regulatory asset and included
2 the adjusted unamortized balance as of June 30, 2024, in rate base as required by statute.
3 Additionally, Staff removed PISA depreciation from the test year ended March 31, 2024,
4 as ultimately those amounts will be included in the deferrals.

5 Q. Did Staff make any additional adjustments to PISA?

6 A. Yes. Staff made an adjustment to remove an amount of incentive compensation
7 from the current PISA deferral.

8 Q. How did Staff determine the amount of incentive compensation to be removed
9 from the PISA deferral?

10 A. Staff used the same approach as was used by Staff in its direct filing in Case No.
11 ER-2022-0337. In the 2022 case, Staff removed an estimated amount of incentive
12 compensation by applying the percentage difference between the total deferral in the Case No.
13 ER-2022-0337 including incentive compensation and without incentive compensation. These
14 amounts were obtained from Ameren Missouri direct workpapers.¹⁰ Staff applied this
15 percentage to calculate an estimated amount of incentive compensation to be removed from the
16 total PISA deferral in this case.

17 Q. Will PISA be part of Staff's true-up audit in this case?

18 A. Yes. Staff intends on updating PISA adjustments through the
19 December 31, 2024 true-up cut off date in this case. During true-up, Staff will replace the
20 adjustment to remove incentive compensation included in this direct filing with an adjustment
21 to remove actual incentive compensation amounts recorded in the PISA deferral.

¹⁰ ER-2022-0337 Ameren Missouri direct workpaper "ADJ62"

1 **ALLOCATIONS**

2 Q. Please describe Ameren Missouri's corporate allocations.

3 A. A subsidiary of Ameren Corporation, Ameren Services Company provides
4 various management and administrative support services to Ameren Missouri and affiliate
5 companies. As part of its audit process, Staff reviewed the methods used by Ameren Services
6 to assign and allocate costs to Ameren Missouri's electric operations. Ameren Services'
7 corporate allocation system categorizes costs as follows:

8 1. Direct Costs – costs that can be identified as being applicable to products or services
9 provided to a single affiliate;

10 2. Direct Allocated Costs – costs that can be identified as being applicable to products
11 or services provided to more than one affiliate;

12 3. Functional Indirect Costs – costs such as office supplies and administrative labor
13 accumulated by functional area and allocated to all affiliates based on the ratio of total
14 direct and direct allocated costs charged to each affiliate;

15 4. Corporate Indirect Costs – costs such as Ameren Services' banking activities and
16 rent allocated based on the ratio of total direct and directly allocated costs charged to
17 each affiliate.

18 Q. Does Staff recommend an adjustment pertaining to corporate allocations?

19 A. Yes. Staff has included adjustments for corporate allocations for allocations to
20 Ameren Missouri for the months in the test year occurring during 2023, reflecting the 2024
21 corporate allocations.

22 **CALLAWAY REFUELING**

23 Q. Please explain Ameren Missouri's Callaway refueling expenses.

1 A. Ameren Missouri’s Callaway nuclear power plant undergoes routine refueling
2 and maintenance outages every 18 months. While refueling, Ameren Missouri typically
3 performs maintenance tasks, inspections, and testing that can only be conducted when the
4 reactor is offline.

5 Q. How does Ameren Missouri account for Callaway refueling outages?

6 A. In Case No. EU-2020-0114, Ameren Missouri sought authority to defer and
7 amortize certain costs related to Callaway Energy Center refueling outages.¹¹ In January of
8 2020, the parties to the case stipulated that the Commission should authorize Ameren Missouri
9 to defer and amortize refueling costs. The balance of the deferred costs does not receive rate
10 base treatment.

11 Q. What is Staff’s recommended treatment of Callaway refueling non-labor costs?

12 A. Ameren Missouri has requested to include an average of actual non-labor costs
13 from the last three refueling outages as the normalized level of Callaway refueling non-labor
14 expense. Staff agrees with Ameren Missouri and has included two-thirds of the average
15 non-labor costs from the last three outages as a normalized level of ongoing expenses for
16 refueling outages. Including an average of the past three refueling outages is consistent with
17 Staff’s approach in Case No. ER-2021-0240, and is also the method utilized by both Ameren
18 Missouri and Staff in Case No. ER-2022-0337.

19 Q. Does Staff recommend any other adjustments pertaining to Callaway’s
20 refueling outages?

21 A. Yes. Staff recommends an adjustment to remove the Callaway refueling
22 amortization from test year.

¹¹Case No. EU-2020-0114, *Application*

1 Q. Does Staff have a recommendation regarding Callaway refueling labor costs?

2 A. Yes. Staff recommends including a normalized amount of overtime costs for
3 Callaway refueling outages based on a three-year average of overtime from Ameren Missouri's
4 past three outages.

5 **INTERCOMPANY BUILDING RENTAL EXPENSE**

6 Q. What did Staff's audit of intercompany building rental expense entail?

7 A. Staff reviewed information pertaining to the expected increase in rental expense
8 for reasonableness.

9 Q. What is Staff's recommendation regarding this expense?

10 A. Staff recommends an increase to allocations to reflect the increase in building
11 rental expense amounts that are allocated to Ameren Missouri from affiliates.

12 Q. Does this conclude your direct testimony?

13 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 Electric Service) Case No. ER-2024-0319

AFFIDAVIT OF JANE C. DHORITY

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

COMES NOW JANE C. DHORITY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Jane C. DhORITY*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

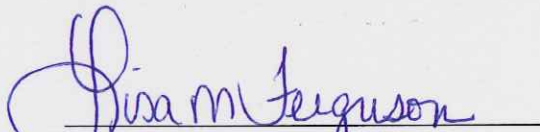


JANE C. DHORITY

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 27th day of November 2024.

LISA M. FERGUSON
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 23, 2028
Commission Number: 16631502



Notary Public

Jane C. Dhority

Present Position:

I am a Senior Utility Regulatory Auditor, Auditing Department, Financial & Business Analysis Division of the Missouri Public Service Commission. As a Senior Utility Regulatory Auditor, I assist in research and analysis of the financial aspects of public utility operations.

Educational Credentials and Work Experience:

I received a Bachelor of Science in Accounting from the University of Missouri – St. Louis in December 2018, and I have been employed by the Missouri Public Service Commission since April 2019.

Past Rate Case Proceedings:

<u>Company Name</u>	<u>Case No.</u>	<u>Issue(s)</u>
Liberty Midstates (GAS)	GR-2024-0106	Training & Travel Costs, Employee Benefits, Incentive Compensation, Pensions & OPEBs, Rate Case Expense, Property Tax Expense & Tracker, Energy Efficiency Regulatory Asset & Rate Base
Ameren UE (ELEC)	EA-2023-0286	Inflation Reduction Act, Tax Credits, Tax Credit Adders, Solar Project Qualifications, RESRAM & IRA Tracker, Solar Project Tax Strategies, Recommendations
Confluence Rivers UOC (WATER)	WR-2023-0006	Website Expense, Line Locating Costs, Billing Software Expense, Call Center Contract Costs, External Audit & Accounting Fees, Legal Expense, PSC Assessment, Rate Case Expense, Cash Working Capital Lead/Lag Study, Miscellaneous Expense, Lab Testing Fees
Ameren UE (ELEC)	EA-2022-0245	PISA, Recordkeeping Issues, Revenue Tracker
Spire Missouri Inc. (GAS)	GR-2022-0179	Payroll, Payroll Taxes, Overtime, Employee Benefits, Pensions & OPEBs, SERP, Rate Case Expense, External Audit/Overhead Study Fees
Liberty MNG (GAS)	GT-2022-0118	ISRS Filing

<u>Company Name</u>	<u>Case No.</u>	<u>Issue(s)</u>
Ameren UE (GAS)	GR-2021-0241	Advertising, Promotional Giveaways, Rents & Leases, Lobbying, Dues & Donations, Miscellaneous Expense, Expense Reports, Capitalized O&M Depreciation, Cash Working Capital, Board of Directors Fees, Customer Convenience Fees
Ameren UE (ELEC)	ER-2021-0240	Advertising, Promotional Giveaways, Rents & Leases, Lobbying, Dues & Donations, Miscellaneous Expense, Expense Reports, Capitalized O&M Depreciation, Cash Working Capital, Board of Directors Fees, Customer Convenience Fees
Ameren UE (ELEC)	ER-2019-0335	Plant in Service, Depreciation Reserve, Other Rate Base Items, Interest on Customer Deposits, Capitalized O&M Depreciation, PSC Assessment, Advertising
Ameren UE (ELEC)	EO-2019-0391	Asset Sale