

*Exhibit No.:*  
*Issue(s):* Large Power Revenue  
*Witness:* Marina Stever  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Direct Testimony  
*Case Nos.:* ER-2024-0319  
*Date Testimony Prepared:* December 5, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**IDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**MARINA STEVER**

**UNION ELECTRIC COMPANY,  
d/b/a AMEREN MISSOURI  
Case No. ER-2024-0319**

*Jefferson City, Missouri  
December 2024*

1 **DIRECT TESTIMONY**

2 **OF**

3 **MARINA STEVER**

4 **UNION ELECTRIC COMPANY,**  
5 **d/b/a AMEREN MISSOURI**

6 **Case No. ER-2024-0319**

7 Q. Please state your name and business address.

8 A. My name is Marina Stever, 200 Madison Street, Jefferson City, MO 65101.

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

10 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
11 a Senior Research/Data Analyst for the Tariff/Rate Design Department in the Industry  
12 Analysis Division.

13 Q. Please describe your educational and work background.

14 A. I have a Master’s of Science in Environmental and Natural Resource Economics  
15 from the University of Rhode Island. Additionally, I hold a Bachelor’s of Science in Business  
16 Administration with a concentration in Economics from the University of Central Missouri.  
17 My work experience prior to becoming of member of Commission Staff includes two years as  
18 an Energy Analyst at Missouri’s Department of Natural Resources- Division of Energy, as well  
19 as one year as an Economic Development Specialist at Missouri’s Department of Economic  
20 Development.

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

22 A. Yes. Please refer to Schedule MS-d1.

1 **EXECUTIVE SUMMARY**

2 Q. What is the purpose of your direct testimony?

3 A. The purpose of my direct testimony is to provide the billed rate revenue  
4 adjustments for Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri")  
5 Large Power Service ("LPS") rate class which are applied to the update period<sup>1</sup> revenues.

6 **RATE REVENUES AND BILLING DETERMINANTS**

7 Q. What are rate revenues and rates?

8 A. Rate revenues are the revenues a utility earns from its customers based on rates  
9 approved by the Commission. The rates consist of a fixed customer charge and variable rates  
10 that are dependent on usage and the season. For example, an energy charge rate for the winter  
11 could be different than an energy charge rate for the summer.

12 Q. What are billing determinants?

13 A. Billing determinants are the units of measurement of different items on a  
14 customer's bill that rates are applied to calculate the customer's total bill. Examples of billing  
15 determinants include, but are not limited to: customer charge, energy usage in kilowatt-hours  
16 (kWh), and demand in kilowatts (kW). Staff's recommended billing determinants for the LPS  
17 class are attached as MS-d2.

18 Q. How are the billing determinants used in Staff's analysis?

19 A. For example, a LPS customer bill includes, but is not limited to, an energy  
20 charge. The customer's energy charge rate can vary depending on the season.<sup>2</sup> For each  
21 customer, Staff multiplies the monthly amount of energy usage by the appropriate rate and sums

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<sup>1</sup> Twelve months ending June 30, 2024.

<sup>2</sup> The summer season is June through September. The winter season is October through May.

1 these products to determine the total LPS usage revenue. Staff performs a similar process for  
2 each of the other billing determinants to calculate the monthly LPS rate revenue.

3 Q. How did Staff determine the rate revenue for the LPS class?

4 A. Staff began by calculating the test year revenue<sup>3</sup> based on billing determinants  
5 provided by Ameren Missouri. Staff then requested the billing determinants for the twelve  
6 months ending June 30, 2024.<sup>4</sup> It is important to note that a rate change went into effect on  
7 July 9, 2023. In Staff's calculations, this new rate was applied to the whole month of July and  
8 to the proceeding months. Staff then calculated the revenue for the twelve months ending  
9 June 30, 2024. Staff "normalizes" and "annualizes" the billing units for the update period and  
10 then applies the appropriate rates and discounts.

11 Q. What is normalization?

12 A. Normalization adjusts Ameren Missouri's billing determinants to account for  
13 unusual events that would likely not happen in future years. Accounting for extreme weather  
14 conditions is an example of normalization.

15 Q. What is annualization?

16 A. For Staff's direct testimony, annualization adjusts Ameren Missouri's billing  
17 determinants to account for known conditions through the test year and update period as if these  
18 conditions were carried out through the entire twelve-month period. Staff will review and  
19 update during true-up. This allows Staff to account for changes that have not been fully reflected  
20 in the unadjusted test year. Adjustments for customers that switch rates are an example of an  
21 annualization adjustment.

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<sup>3</sup> Twelve months ending March 30, 2024.

<sup>4</sup> Data Request Response 0266.0, MPSC 0266 ER-2024-0319 Billing Units Workpaper Update Period\_CONF.xlsx

1 Q. What rate revenue adjustments did Staff make to the LPS rate class?

2 A. Staff made the following adjustments to the LPS rate class:

- 3 a. Update period adjustments,
- 4 b. Adjustments for rate switchers and new entrants,
- 5 c. Weather normalization,
- 6 d. 365 days adjustment,
- 7 e. Missouri Energy Efficiency Investment Act (“MEEIA”) adjustment, and
- 8 f. Economic Development Incentive (“EDI”) adjustment.

9 Q. How did Staff calculate its update period adjustment?

10 A. As mentioned above, Staff requested the billing determinants for July 1, 2023  
11 through June 30, 2024.<sup>5</sup> In Staff’s calculations, the new rate that went into effect on  
12 July 9, 2023, was applied to the whole of month of July and to the proceeding months. Staff  
13 then calculated the revenue for the 12 months ending June 30, 2024. The update period  
14 adjustment is the difference of billed usage and revenue through March 31, 2024, compared to  
15 the billed usage and revenue through the 12 months ending June 30, 2024.

16 Q. What rate switcher or new entrant adjustment did Staff make?

17 A. During the test year, one customer switched from LPS to the Small Power  
18 Service (“SPS”) and one customer switched from SPS to LPS. Staff removed and added the  
19 customer billing units and revenue for these two customers.<sup>6</sup> During the update period, one  
20 new customer started service. Staff annualized this customer’s billing units and revenues.

21 Q. How did Staff calculate the weather normalization and 365-Days adjustment?

22 A. Staff witness Michael Stahlman provided the weather normalization factor for  
23 each month for the LPS class. Staff applied the weather normalization factor to monthly usage  
24 to determine the weather normalization revenue adjustment for the LPS customers’ monthly

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<sup>5</sup> Data Request Response 0266.0, *MPSC 0266 ER-2024-0319 Billing Units Workpaper Update Period\_CONF.xlsx*

<sup>6</sup> Staff witness Kim Cox provides testimony on the SPS rate switchers.

1 usage. Mr. Stahlman also calculated the 365-Days adjustment that was added to Staff's overall  
2 weather normalization factor that was applied to LPS customer usage by month. Mr. Stahlman  
3 explains the weather normalization and 365-Days adjustment in further detail in his direct  
4 testimony.

5 Q. How did Staff calculate the MEEIA and EDI adjustment?

6 A. Staff witness Dr. Hari Poudel provided the monthly MEEIA kWh adjustments  
7 for applicable LPS customers. The EDI discount is available under the EDI Rider tariff to new  
8 non-residential customers or customers expanding kWh load. Customers qualifying for this  
9 incentive receive a billing credit for a set period of time. Dr. Poudel discusses the MEEIA  
10 adjustment and the EDI adjustment in greater detail in his direct testimony.

11 Q. Once the LPS adjustments were completed, what did Staff do with the results?

12 A. Staff provided the LPS revenue and usage adjustments to Staff witness Kim Cox for  
13 a full analysis of rate revenue adjustments of all Ameren Missouri rate classes. The normalized  
14 and annualized usage was provided to Staff witness Michael Stahlman for the Net System Input  
15 ("NSI") calculation. Staff witnesses Alan Bax and Shawn Lange use the normalized and  
16 annualized usage to determine jurisdictional allocations. Additionally, the revenue adjustments  
17 are included in Staff witness Lisa Ferguson's overall revenue requirement.

18 **CONCLUSION**

19 Q. What is your recommendation?

20 A. The Commission should order the revenue requirement based on the attached  
21 billing determinants for the LPS class<sup>7</sup> and the rate revenue adjustments provided in  
22 Staff witness Kim Cox's testimony, to be updated in true up direct.

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<sup>7</sup> Schedule MS-d2

Direct Testimony of  
Marina Stever

- 1 Q. Does this conclude your direct testimony?
- 2 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 MARINA STEVER**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE        )

COMES NOW MARINA STEVER and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony of Marina Stever*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
MARINA STEVER

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26<sup>th</sup> day of November 2024.

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

  
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Notary Public



**Previously Filed Testimony of  
Marina Stever**

<b>Case Number</b>	<b>Company</b>	<b>Issues</b>
ER-2024-0112	Ameren Missouri	RESRAM Rate Adjustment
ER-2024-0187	Ameren Missouri	MEEIA EEIC Rider Adjustment
GR-2024-0106	Liberty Midstates	General Rate Increase
GO-2024-0180	Spire Missouri	Carbon Offset Initiative
ER-2024-0319	Ameren Missouri	General Rate Increase
ER-2024-0189	Evergy West	General Rate Increase
EO-2025-0046	Liberty	DSIM Rider Rate Adjustment
EO-2023-0136	Ameren Missouri	MEEIA Regulatory Changes

Large Power Service	Current Rates	Billing Determinants	Revenue
LPS Customer Charge	\$ 371.39	816	\$ 303,054.24
TOU LPS Customer Charge	\$ 21.08	60	\$ 1,264.80
Low Income	\$ 223.99	816	\$ 182,775.84
Summer Energy	\$ 0.04	1,344,237,924	\$ 48,930,260.42
Winter Energy	\$ 0.03	2,381,969,378	\$ 79,319,580.28
Summer Demand	\$ 21.45	2,502,100	\$ 53,670,034.92
Winter Demand	\$ 9.53	4,444,912	\$ 42,360,010.41
Summer On	\$ 0.01	38,834,131	\$ 248,538.44
Summer Off	\$ (0.00)	81,240,990	\$ (284,343.47)
Winter On	\$ 0.00	73,848,577	\$ 214,160.87
Winter Off	\$ (0.00)	149,665,819	\$ (269,398.47)
Reactive	\$ 0.40	301,211	\$ 120,484.20
Rider B 34/64	\$ (1.24)	1,983,625	\$ (2,459,694.88)
Rider B 116	\$ (1.47)	602,573	\$ (885,782.16)
EDI Adjustment			\$ (7,201,530.52)
			\$ 214,249,415