

**Exhibit No.:** \_\_\_\_\_  
**Issue(s):** Fuel Adjustment Clause (FAC)  
**Witness/Type of Exhibit:** Schaben/Direct  
**Sponsoring Party:** Public Counsel  
**Case No.:** ER-2024-0319

**DIRECT TESTIMONY**  
**OF**  
**ANGELA SCHABEN**

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY**  
**D/B/A AMEREN MISSOURI**

CASE NO. ER-2024-0319

December 3, 2024

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**DIRECT TESTIMONY**  
**OF**  
**ANGELA SCHABEN**  
**AMEREN MISSOURI INC.**  
**CASE NO. ER-2024-0319**

1 **INTRODUCTION**

2 **Q. What is your name, title, and business address?**

3 A. Angela Schaben, Utility Regulatory Auditor, Office of the Public Counsel (“OPC” or “Public  
4 Counsel”), P.O. Box 2230, Jefferson City, Missouri 65102.

5 **Q. What are your qualifications and experience?**

6 A. Please refer to the Schedule ADS-D-1 attached hereto.

7 **Q. Have you testified previously before the Missouri Public Service Commission?**

8 A. Yes.

9 **Q. Would you summarize your recommendations as presented in the subsequent testimony?**

10 A. I recommend the Commission order the continuance of reporting requirements agreed upon in  
11 the Stipulation and Agreement from Union Electric Company d/b/a Ameren Missouri’s  
12 (“Ameren Missouri” or the “Company”) previous rate case, Case Number ER-2022-0337.

13 **Q. What reporting did Ameren Missouri agree to in ER-2022-0337?**

14 A. Ameren Missouri agreed to provide additional monthly fuel reporting to include information  
15 relating to all generation resources added between rate cases, as well as hourly day ahead  
16 and real-time locational marginal prices (“LMP”) for Ameren Missouri’s load and each  
17 generation resource.

1 **Q. Why are you proposing that these reporting requirements continue?**

2 A. The monthly Fuel Report filings related to 20 CSR 4240-20.090(5)(D) should continue to  
3 include information relating to all generation resources added between rate cases in order to  
4 provide a complete representation of all resources included in fuel and purchased power  
5 costs. Additionally, the hourly day ahead and real-time LMP pricing shows the dynamic  
6 MISO energy market pricing by node, which also provides a more complete picture of  
7 overall fuel and purchased power costs. LMP data shows the load and generation values at  
8 different locations on the transmission system.

9 **Q. Are there additional reporting requirements that should be continued?**

10 A. Yes. The OPC should continue to receive the same FAC related correspondence and  
11 notifications that the Staff of the Commission receives.

12 As I stated above, the monthly as-burned fuel report required by 20 CSR 4240-3.190(1)(B)  
13 should continue to include hourly day ahead and real-time locational market prices for  
14 Ameren Missouri's load, and each generating resource, as agreed in Case Number ER-2022-  
15 0337.

16 **Discovery Issues**

17 **Q. Has Ameren Missouri timely responded to your questions issued in discovery?**

18 A. No. I issued OPC data request 1100 to Ameren Missouri on October 22, 2024, requesting  
19 specific information regarding expenditures relating to executive office upgrades. The  
20 Commission's *Order Setting Procedural Schedule and Adopting Test Year* required that  
21 Ameren Missouri object or request additional time within ten calendar days or respond to the  
22 data request within twenty calendar days. (Order 7).

23 The Company objected in part, but also requested an additional ten days to respond.

1           Approximately, thirty-five days after I issued the data request, Ameren Missouri responded  
2           with voluminous information. This delayed response was provided less than a week before  
3           direct testimony in this case is due. That is not enough time to review the response and  
4           formulate a position and potential disallowance. Therefore, I reserve the right to propose such  
5           a disallowance in rebuttal testimony.

6           **Q. Does this conclude your testimony?**

7           A. Yes.

**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 ) Case No. ER-2024-0319  
Revenues for Electric Service )

**AFFIDAVIT OF ANGELA SCHABEN**

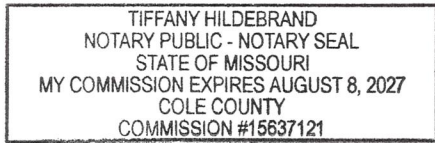
**STATE OF MISSOURI )**  
**) ss**  
**COUNTY OF COLE )**

Angela Schaben, of lawful age and being first duly sworn, deposes and states:

1. My name is Angela Schaben. I am a Utility Regulatory Auditor for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Angela Schaben  
Utility Regulatory Auditor

Subscribed and sworn to me this 2<sup>nd</sup> day of December 2024.



My Commission expires August 8, 2027.

  
\_\_\_\_\_  
Tiffany Hildebrand  
Notary Public