

Exhibit No.:
Issue(s): *Fuel Adjustment Clause*
Witness: *Teresa L. Denney*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2024-0319*
Date Testimony Prepared: *January 17, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

TERESA L. DENNEY

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

CASE NO. ER-2024-0319

Jefferson City, Missouri
January 2025

1 **REBUTTAL TESTIMONY OF**

2 **TERESA L. DENNEY**

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

5 **CASE NO. ER-2024-0319**

6 Q. Please state your name and business address.

7 A. My name is Teresa L. Denney, and my business address is Missouri Public
8 Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.

9 Q. Are you the same Teresa L. Denney who previously provided testimony
10 in this case?

11 A. Yes. I filed direct testimony in the Union Electric Company
12 d/b/a Ameren Missouri (“Ameren Missouri”) current general rate case designated as
13 Case No. ER-2024-0319, on December 3, 2024.

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

15 A. The purpose of my rebuttal testimony is to address Ameren Missouri witness
16 Michael W. Harding’s direct testimony¹ regarding Ameren Missouri’s proposed changes to the
17 Fuel Adjustment Clause (“FAC”) tariff sheets. I will also address the Office of the Public
18 Counsel (“OPC”) witness Angela Schaben’s direct testimony² relating to the FAC.

19 **FUEL ADJUSTMENT CLAUSE**

20 Q. What proposals made by Ameren Missouri does Staff disagree with?

21 A. Staff opposes the following proposals made by Ameren Missouri:

¹ Direct Testimony of Michael W. Harding filed on June 28, 2024.

² Direct Testimony of Angela Schaben filed on December 3, 2024.

1 1. On pages 56-58 of Michael Harding’s direct testimony (Schedule MWH-D1),
2 under the Fuel and Purchased Power Fuel Adjustment Clause section, Ameren proposes to
3 remove language associated with Plant In-Service Accounting (“PISA”) on 1st Revised
4 Sheet No. 72.8. Staff agrees with all of these changes, except for the last statement on tariff
5 sheet number 72.8: “The FAR applicable to the individual Service Classifications, including
6 the calculations on Lines 24 through 29 of Rider FAC, shall be rounded to the nearest \$0.00001
7 to be charged on a \$/kWh basis for each applicable kWh billed.”

8 Q. Why does staff oppose removing this language?

9 A. Staff believes this may have been redlined inadvertently, due to this language
10 being relevant in the FAC tariffs. Regardless, Staff still believes it is appropriate to include
11 language in the tariff that makes it clear the FAR should be rounded to the nearest \$0.00001 to
12 be charged on a \$/kWh basis for each applicable kWh billed; Staff believes this is necessary for
13 rounding issues. This language has been included in the FAC tariff sheets since approved by
14 the Commission in ER-2012-0166.

15 Q. Ameren proposes to update the transmission costs and revenues percentage on
16 tariff sheet 72.3 from 4.97% to 9.46%. What transmission costs and revenues percentage does
17 Staff propose instead?

18 A. Staff calculated the pass-through percentage of Midcontinent Independent
19 System Operator (“MISO”) transmission costs³ and revenues in the FAC as 8.71%.
20 This calculation is based on the output from Staff’s fuel models that were used to develop the

³ The pass-through percentage of MISO transmission costs are a representation of transmission expenses that are associated with energy purchases from the MISO Integrated Marketplace in excess of energy generation by Ameren Missouri’s generation units.

1 revenue requirements found in Staff's direct testimony for this case. Staff's calculations are
2 appropriate because they are consistent with the method used to calculate the pass-through
3 percentage of MISO transmission costs and revenues for Ameren Missouri's current FAC.

4 Q. What other tariff changes proposed by Ameren Missouri does Staff agree with?

5 A. Staff agrees with the proposal made by Ameren Missouri witness
6 Michael Harding to add six new Southwest Power Pool ("SPP") charge types to the FAC tariff
7 sheets. These new charge types were not included in the red lined FAC tariffs provided with
8 Schedule MWH-D1; however, Ameren specified the new charge types in its response to
9 DR 382: Day-Ahead Uncertainty Reserve Amount, Day-Ahead Uncertainty Reserve
10 Distribution Amount, Real-Time Uncertainty Reserve Amount, Real-Time Uncertainty
11 Reserve Distribution Amount, Real-Time Uncertainty Reserve Non-Performance Amount,
12 Real-Time Uncertainty Reserve Non-Performance Distribution Amount.

13 Also, as stated above, Ameren proposes to remove language associated with PISA
14 on 1st Revised Sheet No. 72.8. Staff agrees with all of these changes, except for the last
15 statement on tariff sheet number 72.8, "The FAR applicable to the individual Service
16 Classifications, including the calculations on Lines 24 through 29 of Rider FAC, shall be
17 rounded to the nearest \$0.00001 to be charged on a \$/kWh basis for each applicable kWh
18 billed." Staff believes this is necessary for rounding issues. This language has been included in
19 the FAC tariff sheets since approved by the Commission in ER-2012-0166.

20 Q. Does Staff agree with OPC witness Angela Schaben's recommendation that the
21 Commission order the continuance of reporting requirements agreed upon in the

1 Stipulation and Agreement from Ameren Missouri's previous rate case,
2 Case No. ER-2022-0337?

3 A. Yes. As stated on page 1, lines 14-17, of her testimony, "Ameren Missouri
4 agreed to provide additional monthly fuel reporting to include information relating to all
5 generation resources added between rate cases, as well as hourly day ahead and real-time
6 locational marginal prices ("LMP") for Ameren Missouri's load and each generation resource."
7 Staff agrees the recommended reporting requirements are necessary to ensure that pertinent and
8 adequate data is provided to Staff and OPC.

9 Q. Does this conclude your rebuttal testimony?

10 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 TERESA L. DENNEY

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW TERESA L. DENNEY and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Teresa L. Denney*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



TERESA L. DENNEY

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 15th day of January 2025.

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



Notary Public