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# Exhibit No. 108

Staff – Exhibit 108  
Amanda Conner  
Direct Testimony (Revenue Requirement)  
File No. ER-2022-0337

*Exhibit No.:*  
*Issue(s):* *Fuel Adjustment Clause*  
*Witness:* *Amanda C. Conner*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case No.:* *ER-2022-0337*  
*Date Testimony Prepared:* *January 10, 2023*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**ENERGY RESOURCES DEPARTMENT**

**DIRECT TESTIMONY  
Revenue Requirement**

**OF**

**AMANDA C. CONNER**

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

**CASE NO. ER-2022-0337**

*Jefferson City, Missouri  
January 2023*

1 **DIRECT TESTIMONY OF**

2 **AMANDA C. CONNER**

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

5 **CASE NO. ER-2022-0337**

6 Q. Please state your name and business address.

7 A. My name is Amanda C. Conner, and my business address is Missouri Public  
8 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

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 Utility Regulatory Auditor.

12 Q. Please describe your educational background and work experience.

13 A. Please refer to the attached Schedule ACC-d1.

14 Q. Have you previously filed testimony before this Commission?

15 A. Yes. Please refer to Schedule ACC-d2 for a list of cases in which I have  
16 previously lead or participated.

17 **EXECUTIVE SUMMARY**

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

19 A. The purpose of my direct testimony is to provide the history of the Fuel  
20 Adjustment Clause (“FAC”) for Union Electric Company, d/b/a Ameren Missouri (“Ameren  
21 Missouri”) and to support Staff’s recommendation for continuing Ameren Missouri’s FAC with  
22 certain modifications.

23 Q. What are Staff’s recommendations regarding Ameren Missouri’s FAC to the  
24 Commission?

1           A.       Staff recommends that Ameren Missouri continue the following measures and  
2 implement the recommendations listed below to Ameren Missouri's FAC:

3 Continues Measures:

- 4           1. Continue to include the information provided in Schedule amm-d1 of  
5 Andrew M. Meyer's direct testimony filed in this proceeding in Ameren  
6 Missouri's FAC Monthly Reports, to clarify the major/minor accounts included  
7 and excluded within the FAC, and detailed designations and descriptions for  
8 each account, along with any changes to them between rate cases;
- 9           2. Continue to include one Base Factor for summer and one Base Factor for winter  
10 in the FAC tariff sheets, calculated from the Net Base Energy Costs ("NBEC")  
11 that the Commission includes in the revenue requirement upon which it sets  
12 Ameren Missouri's general rates in this case; and
- 13           3. Continue to include transmission costs and revenues that are included in Ameren  
14 Missouri's FAC consistent with those that Ameren Missouri incurs for  
15 Purchased Power and Off-System Sales. This is a continuation of the currently  
16 used methodology consistent with the FAC with what the Commission termed  
17 as "true purchased power" in its Report and Order in File No. ER-2014-0258.
- 18           4. Continue to provide monthly filings that will aid the Staff in performing FAC  
19 tariff, prudence and true-up reviews; these filings should specifically include  
20 tabs 5D, 5D p1, 5D p2, 5D p3, 5D p4, 5D p5, 5E, 5E p1, 5F, and 5F p1 within  
21 the current monthly filings<sup>1</sup>;
- 22           5. Continue to include within the FAC Monthly Reports information related to the  
23 Renewable Choice Program, as referenced in the Non-Unanimous Stipulation  
24 and Agreement approved in ET-2018-0063. If the Renewable Choice Program  
25 is replaced with another program, similar information should be provided for  
26 that program; and

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<sup>1</sup> 5D is Fuel and Purchase Power Costs and Fuel Related Revenues, 5D p1 is the supplement data for fuel and purchased power costs, 5D p2 is the support data for 5D, 5D p3 is High Prairie data, 5D p4 is Atchison data, and 5D p5 is NEIL Insurance Premium. 5E is Energy Purchases and Sales by RTO and Bilateral, 5E p1 is support data for 5E. 5F is Capacity Purchases and Sales, by RTO and Bilateral, and 5F p1 is support data for 5F.

1 Recommended Measures:

2 In addition to the recommendations listed at the beginning of this section, due to the  
3 accelerated Staff review process necessary with FAC adjustment filings,<sup>2</sup> and just as it did in  
4 previous Ameren Missouri rate cases, Staff is recommending the Commission order  
5 Ameren Missouri to do the following:

- 6 1. As part of the information Ameren Missouri submits when it files a tariff  
7 modification to change its Fuel and Purchased Power Adjustment rate  
8 within the FAC, include Ameren Missouri's calculation of the interest  
9 included in the proposed rate;
- 10 2. In addition to the monthly reports required by 20 CSR 4240-20.090(5),  
11 provide Ameren Missouri's MISO Ancillary Services Market ("ASM")  
12 market settlements and revenue neutrality uplift charges;
- 13 3. Maintain at Ameren Missouri's corporate headquarters, or at some other  
14 mutually-agreed-upon location within a mutually-agreed-upon time for  
15 review, a copy of each and every nuclear fuel, coal, and transportation  
16 contract Ameren Missouri has that is or was in effect for the previous four  
17 (4) years;
- 18 4. Within 30 days of the effective date of each and every nuclear fuel,  
19 coal, and transportation contract Ameren Missouri enters into, provide  
20 both notice to Staff of the contract and opportunity to review the contract  
21 at Ameren Missouri's corporate headquarters or at some other  
22 mutually-agreed-upon location;
- 23 5. Maintain at Ameren Missouri's corporate headquarters, or provide at some  
24 other mutually-agreed-upon location within a mutually-agreed-upon time,  
25 a copy for review of each and every natural gas contract Ameren Missouri  
26 has that is in effect;

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<sup>2</sup> The Company must file its FAC adjustment 60 days prior to the effective date of its proposed tariff sheet. Staff has 30 days to review the filing and make a recommendation to the Commission. The Commission then has 30 days to approve or deny Staff's recommendation.

- 1           6. Within 30 days of the effective date of each and every natural gas contract
- 2           Ameren Missouri enters into, provide both notice to Staff of the contract
- 3           and an opportunity for review of the contract at Ameren Missouri's
- 4           corporate headquarters or at some other mutually-agreed-upon location;
- 5           7. Provide a copy of each and every Ameren Missouri hedging policy;
- 6           8. Within 30 days of any change in an Ameren Missouri hedging policy,
- 7           provide a copy of the changed hedging policy for Staff to retain;
- 8           9. Provide a copy of Ameren Missouri's internal policy for participating in
- 9           the MISO ASM, including any Ameren Missouri sales/purchases from
- 10          that market that are in effect at the time the tariff changes ordered by the
- 11          Commission in this rate case go into effect for Staff to retain;
- 12          10. If Ameren Missouri revises any internal policy for participating in the
- 13          MISO ASM, within 30 days of that revision, provide a copy of the revised
- 14          policy with the revisions identified for Staff to retain;
- 15          11. The monthly as-burned fuel report supplied by Ameren Missouri required
- 16          by 20 CSR 4240-3.190(1)(B) shall explicitly designate fixed and variable
- 17          components of the average cost per unit burned including commodity,
- 18          transportation, emission, tax, fuel blend, and any additional fixed or
- 19          variable costs associated with the average cost per unit reported (Staff is
- 20          willing to work with Ameren Missouri on the electronic format of this
- 21          report);
- 22          12. Notification to Staff within 30 days of entering a new long-term contract
- 23          for purchased power or changes to a purchased power contract.

24       **HISTORY**

25           Q. Please describe the history of Ameren Missouri's FAC.

26           A. The Commission first approved Ameren Missouri's request for an FAC in  
27 Case No. ER-2008-0318. In Case Nos. ER-2010-0036, ER-2011-0028, ER-2012-0166,

1 ER-2014-0258, ER-2016-0179, ER-2019-0335, and ER-2021-0240, Ameren Missouri  
2 requested and received authorization to continue its FAC.

3 The primary features of Ameren Missouri's present FAC (tariff sheet MO. P.S.C.  
4 Schedule No. 6 Original Sheet No's 71.16 through 71.30) include:

- 5 1. Three, four-month accumulation periods<sup>3</sup> ("AP"): February through May,  
6 June through September, and October through January;
- 7 2. Three, eight-month recovery periods<sup>4</sup> ("RP"): October through May,  
8 February through September, and June through January;
- 9 3. One Base Factor<sup>5</sup> for June through September calendar months (Summer)  
10 and one Base Factor for October through May calendar months (Winter);
- 11 4. A 95%/5% sharing mechanism<sup>6</sup>;
- 12 5. Fuel Adjustment Rates<sup>7</sup> ("FAR") for individual service classifications  
13 adjusted for the two Ameren Missouri service voltage levels, rounded to the  
14 nearest \$0.00001, and charged on each kWh billed;
- 15 6. True-up of any over- or under- recovery of revenues following every  
16 recovery period with a true-up amount being included in the determination of  
17 FAR for a subsequent recovery period; and
- 18 7. Prudence reviews of the costs subject to the FAC shall occur no less  
19 frequently than every 18 months.

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<sup>3</sup> An AP is the calendar months during which the actual costs and revenues are accumulated for the purposes of the Fuel Adjustment Rate.

<sup>4</sup> A RP is the billing calendar months during which the FAR is applied to retail customer usage on a per kWh basis, as adjusted for service voltage.

<sup>5</sup> The Base Factor, which is equal to the normalized value for the sum of allowable fuel costs, plus costs of purchased power, and emission costs and revenues, less revenues from off-system sales, divided by corresponding normalized retail kWh as adjusted for applicable losses. At this time Staff does not have its estimate for the Base Factor for the FAC, but will provide it and a discussion on the calculation of the Base Factor when Staff files its Class Cost of Service/Rate Design Direct Testimony on January 24, 2023. Staff will use the Base Energy Cost and the kWh at the generator from its fuel run to develop the Base Factor.

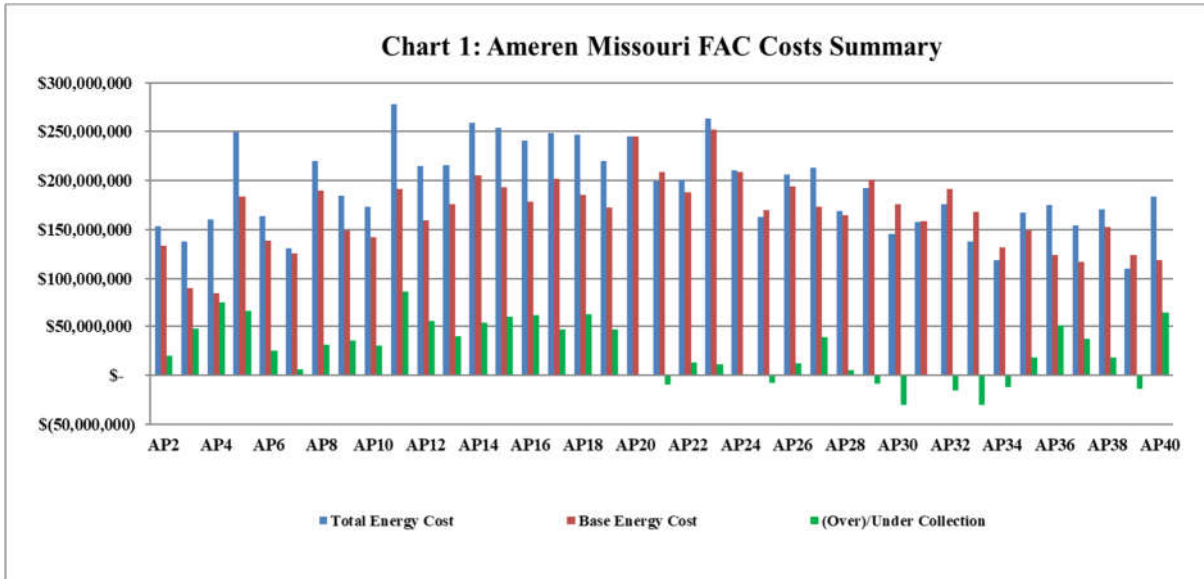
<sup>6</sup> 95% of the difference between the ANEC and B for each respective AP will be used to calculate the FAR.

<sup>7</sup> The FAR for each accumulation period is the amount that is returned to or collected from customers as part of a decrease or an increase of the FAC Fuel and Purchased Power Adjustment per kWh rate.

1 Q. Please explain the historical operation of Ameren Missouri's FAC.

2 A. Ameren Missouri has filed for and received approval of changes to its FARs for  
3 40 completed accumulation periods ("AP") (AP2 through AP40). Chart 1 below shows a  
4 summary of Ameren Missouri's Actual Net Energy Costs ("ANEC")<sup>8</sup>, NBEC, and the over- or  
5 under-collection of fuel and purchased-power costs minus off-system sales revenues through  
6 its permanent rates, for each full accumulation period<sup>9</sup> since the Commission authorized  
7 Ameren Missouri's FAC.

8 **Chart 1**



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10  
11 *continued on next page*

<sup>8</sup> Actual Net Energy Cost is defined in Ameren Missouri's current FAC tariff sheet, MO. P.S.C. Schedule 6, Original Sheet No. 71.17, as: Fuel costs and revenues (FC) plus purchased power costs and revenues (PP) plus costs and revenues for SO<sub>2</sub> and NO<sub>x</sub> emissions allowances (E) plus costs and revenues for net insurance recoveries (R) minus off system sales revenues (OSSR). The formula appears as: ANEC = FC + PP + E + R - OSSR.

<sup>9</sup> Accumulation Period 1 was not a full accumulation period because it only covered the three calendar months of March 2009 through May 2009. All other accumulation periods cover four calendar months.



1 The time periods of the accumulation periods (“APs”) in Chart 1 are as follows:

2	AP1: March 2009 – May 2009	AP2: June 2009 – September 2009
3	AP3: October 2009 – January 2010	AP4: February 2010 – May 2010
4	AP5: June 2010 – September 2010	AP6: October 2010 – January 2011
5	AP7: February 2011 – May 2011	AP8: June 2011 – September 2011
6	AP9: October 2011 – January 2012	AP10: February 2012 – May 2012
7	AP11: June 2012 – September 2012	AP12: October 2012 – January 2013
8	AP13: February 2013 – May 2013	AP14: June 2013 – September 2013
9	AP15: October 2013 – January 2014	AP16: February 2014 – May 2014
10	AP17: June 2014 – September 2014	AP18: October 2014 – January 2015
11	AP19: February 2015 – May 2015	AP20: June 2015 – September 2015
12	AP21: October 2015 – January 2016	AP22: February 2016 – May 2016
13	AP23: June 2016 – September 2016	AP24: October 2016 – January 2017
14	AP25: February 2017 – May 2017	AP26: June 2017 – September 2017
15	AP27: October 2017 – January 2018	AP28: February 2018 – May 2018
16	AP29: June 2018 – September 2018	AP30: October 2018 – January 2019
17	AP31: February 2019 – May 2019	AP32: June 2019 – September 2019
18	AP33: October 2019 – January 2020	AP34: February 2020 – May 2020
19	AP35: June 2020 – September 2020	AP36: October 2020 – January 2021
20	AP37: February 2021 – May 2021	AP38: June 2021 – September 2021
21	AP39: October 2021 – January 2022	AP40: February 2022 – May 2022

22 At the conclusions of its electric rate cases, during AP5, AP8, AP12, AP22, AP26,  
23 AP34, AP35, AP36, AP37, AP38 and AP40 – Case Nos. ER-2010-0036, ER-2011-0028,  
24 ER-2012-0166, ER-2014-0258, ER-2016-0179, ER-2021-0022, and ER-2023-0031,  
25 respectively – the Base Factors in Ameren Missouri’s FAC were re-set. Over all full  
26 accumulation periods except for AP20, AP21, AP25, AP29, AP30, AP31, AP32, AP33, AP34,  
27 and AP39, Ameren Missouri under-collected its fuel and purchased-power costs in its

1 permanent rates as a result of Ameren Missouri's ANEC exceeding the NBEC for the  
2 accumulation period.

3 Chart 1 also shows that the range of Ameren Missouri's ANEC varies from  
4 approximately \$111 million for AP39 (October 2021 – January 2022), to approximately  
5 \$278 million for AP11 (June 2012 – September 2012). Based on this varied range of Ameren  
6 Missouri's ANEC, Chart 1 shows that Ameren Missouri's ANECs have continued to be large  
7 and volatile, which is why Staff recommends that the Commission approve, with modifications,  
8 the continuation of Ameren Missouri's FAC.

9 **CONTINUATION OF FAC**

10 Q. Is setting the Base Factor in Ameren Missouri's FAC tariff sheets critical?

11 A. Yes. Correctly setting the Base Factor in Ameren Missouri's FAC tariff sheets  
12 is critical to both a well-functioning FAC and a well-functioning FAC sharing mechanism. For  
13 the reasons below, Staff recommends the Commission require the Base Factor in Ameren  
14 Missouri's FAC be set based on the Base Energy Cost that the Commission includes in the  
15 revenue requirement on which it sets Ameren Missouri's general rates in this case.

16 Q. Please provide examples illustrating why setting the base factor correctly is so  
17 critical.

18 A. Table 1 below shows the three scenarios in which the FAC Base Energy Cost  
19 used to set the FAC Base Factor is equal to, less than, or greater than the Base Energy Cost in  
20 the revenue requirement upon which the Commission sets general rates:

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Table 1: Base Energy Cost Case Studies				
		Case 1	Case 2	Case 3
Line	95%/5% Sharing Mechanism	Energy Cost in FAC <u>Equal To</u> Base Energy Cost in Rev. Req.	Energy Cost in FAC <u>Less Than</u> Base Energy Cost in Rev. Req.	Energy Cost in FAC <u>Greater Than</u> Base Energy Cost in
a	Revenue Requirement	\$ 10,000,000	\$ 10,000,000	\$ 10,000,000
b	Base Energy Cost in Rev. Req.	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
c	Base Energy Cost in FAC	\$ 4,000,000	\$ 3,900,000	\$ 4,100,000
<b>Outcome 1: Actual Energy Cost <u>Greater Than</u> Base Energy Cost in Revenue Requirement</b>				
d	Actual Total Energy Cost	\$ 4,200,000	\$ 4,200,000	\$ 4,200,000
	Billed to Customer:			
= b	in Permanent Rates	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
e = (d - c) x 0.95	through FAC	\$ 190,000	\$ 285,000	\$ 95,000
f = b + e	Total Billed to Customers	\$ 4,190,000	\$ 4,285,000	\$ 4,095,000
g = f - d	<b>Kept/(Paid) by Company</b>	\$ (10,000)	\$ 85,000	\$ (105,000)
<b>Outcome 2: Actual Energy Cost <u>Less Than</u> Base Energy Cost in Revenue Requirement</b>				
h	Actual Energy Cost	\$ 3,800,000	\$ 3,800,000	\$ 3,800,000
	Billed to Customer:			
= b	in Permanent Rates	\$ 4,000,000	\$ 4,000,000	\$ 4,000,000
i = (h - c) x 0.95	through FAC	\$ (190,000)	\$ (95,000)	\$ (285,000)
j = b + i	Total Billed to Customers	\$ 3,810,000	\$ 3,905,000	\$ 3,715,000
k = j - h	<b>Kept/(Paid) by Company</b>	\$ 10,000	\$ 105,000	\$ (85,000)

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Case 1 illustrates that if the FAC Base Energy Cost used for the Base Factor is equal to the Base Energy Cost in the revenue requirement used for setting general rates, the utility does not over- or under-collect as a result of the level of total actual energy costs.

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Case 2 illustrates that if the FAC Base Energy Cost used for the Base Factor is less than the Base Energy Cost in the revenue requirement used for setting general rates, the utility will collect more than what was intended, and customers will pay more than the FAC was designed for them to pay, regardless of the level of actual energy costs.

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Case 3 illustrates that if the FAC Base Energy Cost used for the Base Factor is greater than the Base Energy Cost in the revenue requirement used for setting general rates, the utility

1 will not collect all of the costs that was intended in the FAC design, and customers will pay less  
2 than the entire amount intended, regardless of the level of actual energy costs.

3           These three cases illustrate the importance of setting the Base Factor in the FAC  
4 correctly, i.e., revising the Base Factor to match the Base Energy Cost in the revenue  
5 requirement used for setting general rates.

6           Q.     Which scenario is Staff's preferred case and properly sets up the Base Factor  
7 correctly to match the Base Energy Cost in the revenue requirement used for setting general  
8 rates?

9           A.     Case 1 is the preferred case, as it illustrates how the FAC is intended to work,  
10 because the amount refunded to or collected from customers is closest to zero. In addition,  
11 Outcome 1 and Outcome 2 under Case 1 result in the utility collecting slightly more than what  
12 was intended or the customers pay slightly less than what was intended, as opposed to the more  
13 extreme outcomes under Cases 2 and 3.

14          Q.     Is there a comparison between Ameren Missouri's current NBEC, and the  
15 NBEC proposed in this current rate case filing?

16          A.     Yes. Table 2 below contains a comparison of Ameren Missouri's FERC account  
17 expenses and revenues, annual kWh's, cents per kWh, and NBEC approved in the last general  
18 rate case, Case No. ER-2021-0240, and Ameren Missouri's proposed NBEC in this case.  
19 Ameren Missouri's proposed fuel and purchased-power expenses increased a total of 29.28%  
20 compared to the fuel and purchased-power expenses approved in Case No. ER-2021-0240.  
21 Ameren Missouri's proposed FAC revenues increased a total of 56.87% compared to the  
22 revenues approved in Case No. ER-2021-0240. Although the FAC revenues increased a total  
23 of 56.87%, the overall NBEC is increasing by 10.15%; this explains the overall increase in

1 revenues and fuel and purchased-power expenses which is consequently why the proposed Base  
2 Factor is increasing.

3 Q. Does Staff recommend the continuation of Ameren Missouri's FAC?

4 A. Yes. Staff recommends continuation of Ameren Missouri's FAC. Ameren  
5 Missouri's fuel and purchased-power costs, less off-system sales revenues, continue to be  
6 volatile. While the Company can control some FAC related costs, there are some that are more  
7 difficult for Ameren Missouri to control. The proposed NBEC is \$442,446,561, which  
8 represents approximately 12.20%<sup>10</sup> of Ameren Missouri's proposed annual revenue  
9 requirement of \$3,627,692,000 for this case.

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20 *continued on next page*

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<sup>10</sup> This percentage is from page 39 of Ameren Missouri witness Mitchell Lansford's direct testimony and is comprised of the proposed Net Base Energy Costs of \$442,446,561, divided by the total proposed annual revenue requirement of \$3,627,692,000.

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<b>Table 2</b>					
<b>Comparison of Ameren Missouri's NBEC From ER-2021-0240 to ER-2022-0337</b>					
		<b>ER-2021-0240</b>	<b>ER-2022-0337</b>	<b>Difference</b>	<b>Percent Difference</b>
<b>FERC Account Expenses</b>	<b>501 Coal</b>	\$ 505,931,895	\$ 484,610,408	\$ (21,321,487)	-4.21%
	<b>502 AQCS</b>	\$ 7,892,163	\$ 7,203,443	\$ (688,720)	-8.73%
	<b>518 Nuclear</b>	\$ 68,927,000	\$ 62,765,324	\$ (6,161,676)	-8.94%
	<b>547 Natural Gas</b>	\$ 25,067,277	\$ 32,115,211	\$ 7,047,934	28.12%
	<b>555 Purchased Power</b>	\$ 58,358,344	\$ 69,611,680	\$ 11,253,336	19.28%
	<b>565 Transmission by Others</b>	\$ 1,495,525	\$ 3,697,835	\$ 2,202,310	147.26%
	<b>Capacity Expense</b>	\$ 11,829,415	\$ 218,593,605	\$ 206,764,190	1747.88%
	<b>925 Replacement Power Ins.</b>	\$ 653,138	\$ 687,760	\$ 34,622	5.30%
<b>Total FERC Account Expenses</b>		<b>\$ 680,154,757</b>	<b>\$ 879,285,266</b>	<b>\$ 199,130,509</b>	<b>29.28%</b>
<b>FERC Account Revenues</b>	<b>447 OSSR Energy</b>	\$ 241,529,364	\$ 189,830,535	\$ (51,698,829)	-21.40%
	<b>447 Capacity Sales</b>	\$ 18,026,213	\$ 228,379,369	\$ 210,353,156	1166.93%
	<b>447 Other (Note 1)</b>	\$ 18,377,624	\$ 17,154,130	\$ (1,223,494)	-6.66%
	<b>456 Transmission Revenues</b>	\$ 534,354	\$ 1,474,671	\$ 940,317	63.76%
<b>Total FERC Account Revenues</b>		<b>\$ 278,467,555</b>	<b>\$ 436,838,705</b>	<b>\$ 158,371,150</b>	<b>56.87%</b>
<b>Net Base Energy Costs</b>		<b>\$ 401,687,202</b>	<b>\$ 442,446,561</b>	<b>\$ 40,759,359</b>	<b>10.15%</b>
	<b>Annual kWh</b>	32,496,511,680	32,510,188,374	(13,676,694)	-0.04%
	<b>Annual Cents per kWh</b>	\$ 12.36	\$ 13.61	\$ (1.249)	-10.10%
	<b>Winter 1 Cents per kWh</b>	\$ 1.192	\$ 1.036	\$ (0.156)	-13.12%
	<b>Winter 2 Cents per kWh</b>	\$ 1.192	\$ 1.036	\$ (0.156)	-13.12%
	<b>Summer Cents per kWh</b>	\$ 1.323	\$ 1.149	\$ (0.174)	-13.13%
Note 1: Other revenues in FERC Account 447 include the following:					
MISO Make Whole Payments Margins					
Ancillary Services Revenue					
Financial Swaps					
Real-Time Load and Generation Deviation					
Source: Column ER-2021-0240 amounts were approved per order by the Commission in Case No. ER-2021-0240.					
Column ER-2022-0337 amounts are from Company Witness Mitchell Lansford's Schedule D-17.					

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Q. What is Ameren Missouri proposing to re-base the Base Factor to?

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A. In the current rate case, Ameren Missouri is proposing to re-base the Base Factor

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to \$0.01448 per kWh for the June to September calendar months and \$0.01312 per kWh for the

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October through May calendar months. At this time, Staff does not have its estimate for the

1 Base Factor for the FAC, but will provide it and a discussion on the calculation of the Base  
2 Factor when Staff files its Class Cost of Service/Rate Design Report on January 24, 2023. Staff  
3 will use the Base Energy Cost and the kWh at the generator from its fuel run to develop the  
4 Base Factor.

5 Q. What is the Voltage Adjustment Factor (VAF) and how does it relate to the  
6 FAC?

7 A. VAFs adjust for the energy losses experienced in the delivery of electricity from  
8 the generator to customers with secondary, primary, high voltage, and transmission levels.  
9 These VAFs are utilized in Staff's determination of a FAR for each voltage service  
10 classification. Staff witness Alan J. Bax addresses the Voltage Adjustment Factors in his direct  
11 testimony.

12 Q. What are the transmission costs and revenues and how do they factor into the  
13 determination of the Base Factor and the FAC?

14 A. Transmission costs and revenues are related to the MISO and Non-MISO costs  
15 and revenues associated with network transmission service, point-to-point transmission service,  
16 system control and dispatch, and reactive supply and voltage control. These are all related to  
17 MISO Schedules 1, 2, 7, 8, 9, 11, 26, 26A, 26C, 26D, 33, 37, 38, 41, 41-A, 42-B, 45, and 47.

18 Currently, Ameren Missouri is allowed to include 1.84% of these associated  
19 transmission costs and 1.84% of these associated transmission revenues for recovery through  
20 the FAC.

21 Q. What is Ameren Missouri proposing to replace the current transmission costs  
22 percentage with?

Direct Testimony of  
Amanda C. Conner

1           A.     In the current rate case, Ameren Missouri is proposing to update the current  
2 transmission percentage of 1.84% to 4.97% of transmission costs and 4.97% of transmission  
3 revenues. At this time Staff does not have its estimate for the transmission costs and revenues,  
4 but will provide it when Staff files its Class Cost of Service/Rate Design Report on January 24,  
5 2023.

6           Q.     Does this conclude your direct testimony?

7           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-2022-0337

**AFFIDAVIT OF AMANDA C. CONNER**

STATE OF MISSOURI        )  
  )  
COUNTY OF COLE         )        ss.

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

Further the Affiant sayeth not.

  
AMANDA C. CONNER

**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 5<sup>th</sup> day of January 2023.

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

### **Educational Background and Work Experience of Amanda C. Conner**

My educational background includes a Bachelor of Science degree in Accounting/Finance from Columbia College in Columbia, Missouri where I graduated in May of 2012.

In February 2016, I started a new career as a Utility Regulatory Auditor I with the Missouri Office of Public Counsel, where I worked for five years providing support and testimony for several rate cases before accepting my position as Regulatory Auditor with the Energy Resources Department of the Missouri Public Service Commission. Since that point, my experience includes Fuel Adjustment Clause Prudence Reviews, Missouri Energy Efficiency Investment Act Prudence Reviews, and Fuel Adjustment Rate filings.

My prior work experience includes eight years with the Missouri Department of Revenue first in the Taxation Division, and then in the General Counsel's Office where I handled taxation issues regarding Bankruptcy.

CASE PROCEEDING PARTICIPATION  
AMANDA C. CONNER, UTILITY REGULATORY AUDITOR

OPC PARTICIPATION		ISSUE	TESTIMONY TYPE	LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EMPIRE	ER-2016-0023	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2016-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LACLEDE GAS COMPANY	GR-2017-0215	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MGE	GR-2017-0216	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
MAWC	WR-2017-0285	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
LIBERTY	GR-2018-0013	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
GMO	ER-2018-0146	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
KCPL	ER-2018-0145	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL		
EMPIRE	ER-2019-0374	GENERAL RATE CASE	DIRECT, REBUTTAL, SURREBUTTAL, TESTIFIED AT HEARING		
SPIRE	GR-2021-0108	GENERAL RATE CASE	DIRECT		
EMPIRE	ER-2021-0097	FAR FILING-9th REVISED (24th AP)	STAFF REPORT		
EMPIRE	ER-2022-0095	FAR FILING-11TH REVISED (26th AP)	STAFF REPORT		
PSC PARTICIPATION		ISSUE		LEAD	STATUS
COMPANY	CASE NUMBER			STAFF	
EVERGY MO METRO (prior KCPL)	EO-2021-0417	MEEIA PRUDENCE REVIEW (3rd)	STAFF REPORT, DIRECT		
EVERGY MO METRO (prior KCPL)	ER-2022-0129	GENERAL RATE CASE	COS Direct		
EVERGY MO WEST (prior GMO)	ER-2022-0130	GENERAL RATE CASE	COS Direct		
EMPIRE	EO-2023-0087	FAC PRUDENCE REVIEW	STAFF REPORT		**
AMEREN MISSOURI	ER-2022-0337	GENERAL RATE CASE	COS Direct, CCOS DIRECT, REBUTTAL, SURREBUTTAL/TRUE-UP DIR	*	**

Status:       \*       In Hearing  
                 \*\*       In Process (working on case)

**Case No. ER-2022-0337**  
**Schedule ACC-d2**