

Exhibit No.:
Issue(s): *Weather*
Normalization/365 day,
Rate Switching Customer
Growth, MEEIA
Witness: *Kim Cox*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Direct Testimony*
Case No.: *ER-2024-0319*
Date Testimony Prepared: *February 14, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

TRUE-UP DIRECT TESTIMONY

OF

KIM COX

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

CASE NO. ER-2024-0319

Jefferson City, Missouri
February 2025

1 **TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **KIM COX**

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 Kim Cox and my business address is 200 Madison Street, Jefferson
9 City, Missouri 65101.

10 Q. Are you the same Kim Cox who filed direct Cost of Service (“COS”) and
11 rebuttal testimony in this case?

12 A. Yes.

13 Q. What is the purpose of your true-up direct testimony?

14 A. The purpose of my true-up direct testimony is to provide the updated weather
15 normalization and 365 days adjustment, customer growth, rate switching, and the Missouri
16 Energy Efficiency Investment Act (“MEEIA”) revenue adjustments.

17 **TRUE-UP ADJUSTMENTS**

18 Q. What are Staff’s updated weather normalization and 365 days adjustments?

19 A. Staff witness Michael L. Stahlman provides updated Residential (“RES”) and
20 Small General Service (“SGS”) block percentages and updated weather and 365 days factors
21 for the RES, SGS, Large General Service (“LGS”), and Small Primary Service (“SPS”)

1 classes.¹ Updating these reduced the weather normalization and 365 days adjustments by
2 \$3,685,524.

3 Q. What is Staff's true-up customer growth adjustment?

4 A. As stated in my direct COS and rebuttal testimony, Staff reviewed and made
5 necessary adjustments to the RES, SGS, LGS, and SPS number of customer bills per month.
6 Staff applied December 2024 customer counts to the 12 months ending June 2024 for the RES,
7 SGS, LGS and SPS classes. Staff uses the same methodology for true-up growth that was used
8 in the direct COS filing.²

9 Q. What is Staff's rate switching true-up adjustment?

10 A. Staff's rate switch adjustment remains the same as filed in the direct COS.
11 Ameren Missouri's response to Staff Data Request ("DR") 0446 states there were no SPS or
12 Large Power Service ("LPS") switchers in the true-up period, June 30, 2024 to
13 December 31, 2024.

14 Q. What is Staff's Missouri Energy Efficiency Investment Act ("MEEIA")
15 true-up adjustment?

16 A. Staff witness Dr. Hari K. Poudel provides total true-up Kilowatt hour ("kWh")
17 MEEIA adjustment for the RES, SGS, LGS and SPS rate classes.³ Staff applied the true-up
18 monthly MEEIA adjustment by using the same method it did in the direct COS filing in
19 this case.⁴

¹ Michael L. Stahlman discusses these updates in his Surrebuttal testimony.

² Cox, direct testimony, page 7, lines 7-17, page 8, and page 9, lines 1-6. The Commission's Order Setting Procedural Schedule and Adopting Test Year on page 3, footnote 5 states that "No party shall revise or change that party's methods or methodologies for true-up issues.

³ Dr. Hari K. Poudel discusses the MEEIA and the calculation of the MEEIA kWh adjustment in his true-up direct testimony.

⁴ Cox, direct testimony, page 7, lines 4-6.

True-Up Direct Testimony
of Kim Cox

CONCLUSION

Q. What are your recommended true-up rate revenue adjustments?

A. The Commission should base its awarded revenue requirement on Staff's rate revenue adjustments as provided below.

Rate Class	Test Year Revenue	Update Period Adj. (includes rate change)	Rate Switching and Large Customer Annualization	Weather & Days Adj.	MEEIA Adjustment	Growth Adjustment	Remove Rev. from Low Income Charge*	EDI Adjustment	Total MO Normalized Revenue
Res 1M	\$ 1,422,285,564	\$ 14,630,719	\$ -	\$ 13,569,338	\$ (6,201,021)	\$ 13,095,788	\$ (1,847,308)		\$ 1,455,533,081
SGS 2M	\$ 322,329,877	\$ 5,583,546		\$ 2,014,594	\$ (2,232,870)	\$ 1,239,182	\$ (348,749)		\$ 328,585,581
LGS 3M	\$ 582,734,666	\$ 6,317,765	\$ -	\$ 2,247,375	\$ (4,317,567)	\$ (333,371)	\$ (270,696)	(1,364,931)	\$ 585,013,241
SPS 4M	\$ 244,840,924	\$ 2,875,340	\$ (1,773,591)	\$ (1,049,274)	\$ (1,536,355)	\$ (2,420,323)	\$ (16,661)	(1,717,508)	\$ 239,202,552
LPS 11M - Marina	\$ 215,398,047	\$ 3,464,977	\$ 3,680,414	\$ (1,052,511)	\$ (118,034)			(6,955,221)	\$ 214,417,671
Lighting 5m	\$ 39,022,037	\$ 174,394							\$ 39,196,432
Lighting 6m	\$ 984,601	\$ 13,062							\$ 997,663
Lighting 6m metered	\$ 1,962,152	\$ (7,853)							\$ 1,954,299
MSD	\$ 84,885	\$ 1,107							\$ 85,992
Total	\$ 2,829,642,753	\$ 33,053,058	\$ 1,906,822	\$ 15,729,522	\$ (14,405,846)	\$ 11,581,275	\$ (2,483,413)	\$(10,037,660)	\$ 2,864,986,511

Q. Does this conclude your true-up direct testimony?

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 KIM COX

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Kim Cox*; and that the same is true and correct according to her best knowledge and belief.

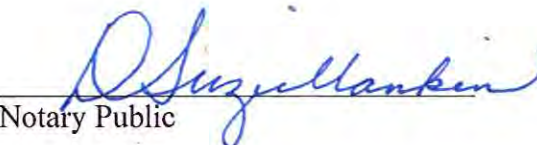
Further the Affiant sayeth not.


_____)
KIM COX

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 5th day of February 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