

Exhibit No.:
Issue(s): Variable Fuel Expense
Witness: Shawn E. Lange, PE
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Direct
Testimony
Case No.: ER-2024-0319
Date Testimony Prepared: February 14, 2025

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

TRUE-UP DIRECT TESTIMONY

OF

SHAWN E. LANGE, PE

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

CASE NO. ER-2024-0319

*Jefferson City, Missouri
February 2025*

**** Denotes Confidential Information ****

1 **TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **SHAWN E. LANGE, PE**

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 Shawn E. Lange and my business address is Missouri Public Service
9 Commission, P.O. Box 360, Jefferson City, Missouri 65102.

10 Q. Are you the same Shawn E. Lange who filed direct and rebuttal in this case?

11 A. Yes, I am.

12 **TRUE-UP DIRECT TESTIMONY**

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 variable fuel and
15 purchase power expense incorporating all known and measurable changes as of
16 December 31, 2024, as well as discuss any revisions from direct.

17 Q. How have you revised your production model for true-up?

18 A. I have updated the time periods reflected in certain model assumptions to change
19 the ending period from the update cut off to the true-up cut off. I have also made certain
20 modifications to the modeling associated with certain solar facilities meeting in-service.

21 Q. What changes were made to the modeling associated with certain solar facilities?

22 A. In direct, Staff did not model the Huck Finn, Boomtown, and Cass County
23 facilities as part of Ameren Missouri's generation portfolio. With the assets meeting the

True-Up Direct Testimony
of Shawn E. Lange, PE

1 in-service criteria during the true-up period,¹ these assets are modeled as being a part of Ameren
2 Missouri's generation portfolio. ** [REDACTED]
3 [REDACTED] ² [REDACTED]
4 [REDACTED]
5 [REDACTED] **.

6 Q. What is the value of the variable fuel and purchase power expense?

7 A. Staff calculates the variable fuel and purchased power expense for
8 Ameren Missouri for known and measurable changes through December 31, 2024, to
9 be \$392,847,925.

10 Q. What is the true up value of the real time deviation?

11 A. The adjustments for real time deviation and virtual transactions are
12 ** [REDACTED] **.

13 Q. What is your recommendation?

14 A. I recommend that the Commission adopt the updated variable fuel and purchase
15 power expense that Staff modeled as well as the updated value of physical bilateral margins,
16 financial swaps, and real time deviation.

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

18 A. Yes, it does.
19
20

¹ More information regarding in-service criteria for these assets is included in Staff Witness Brodrick Niemeier's true-up direct testimony.

² In 2019, Ameren Missouri partnered with BJC HealthCare to put 4,500 solar panels on top of a parking garage on its medical campus with a generation capacity of approximately 1.6 MW.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

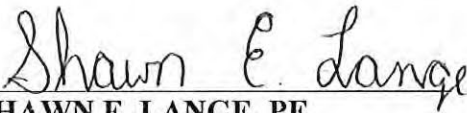
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
Its Revenues for Electric Service) Case No. ER-2024-0319

AFFIDAVIT OF SHAWN E. LANGE, PE

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW SHAWN E. LANGE, PE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Shawn E. Lange, PE*; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.


SHAWN E. LANGE, PE

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 10th 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