

Exhibit No.:

Issue(s): *Green Button Connect My
Data, Residential Battery
Storage Pilot*

Witness: *Matthew W. Lucas*

Sponsoring Party: *MoPSC Staff*

Type of Exhibit: *Surrebuttal / 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

SURREBUTTAL TESTIMONY

OF

MATTHEW W. LUCAS

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

CASE NO. ER-2024-0319

*Jefferson City, Missouri
February 2025*

**** Denotes Confidential Information ****

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MATTHEW W. LUCAS
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1 Commission to order a formal tariff to govern its use. He reasons that such an order would
2 imply Ameren Missouri would act in “bad faith or incompetently”² without such a tariff, and
3 that it would usurp Ameren Missouri’s prerogative to make its own business decisions.

4 Q. Do you agree that absent establishing a tariff for GBC Ameren Missouri would
5 act in bad faith or incompetently?

6 A. No, Staff does not believe that adopting a tariff for GBC would reflect poorly
7 on Ameren Missouri’s business practices. If the Commission orders Ameren Missouri to offer
8 GBC to its customers, it may be appropriate to adopt a tariff, at the time of program
9 implementation, to outline the policy and procedures for its operation. This is because there
10 would need to be well-defined procedures established for GBC, especially in the security and
11 privacy standards end-users need to meet, and in what circumstances end-users can be
12 denied service.

13 That being said, much of the items needed for an effective policy or tariff are currently
14 unknown, so Staff does not think a tariff is appropriate at this time. If Ameren Missouri were
15 to implement GBC either due to a Commission order in this case, or of its own volition in the
16 future, Staff would need more concrete details about the proposed program before making a
17 recommendation on what, if anything, would be most appropriate to include in a tariff.

18 **RESPONSE TO MR. ALLEN’S TESTIMONY REGARDING GBC**

19 Q. Please summarize Mr. Allen’s testimony regarding GBC.

20 A. Mr. Allen seeks the full dismissal of Renew Missouri’s proposed GBC adoption.
21 and provides engagement data for Ameren Missouri’s existing Green Button Download My

² ER-2024-0319. Rebuttal Testimony of Steven Wills. Page 35, line 17

Surrebuttal Testimony
of Matthew W. Lucas

1 Data (“GBD”) offering that is currently not widely used. He also challenges Renew’s cost
2 estimate for GBC implementation, as well as recounting Ameren Illinois’s experience with
3 offering GBC.

4 Q. How does Staff respond to the cost estimates provided by Mr. Allen?

5 A. While Mr. Allen acknowledges that Ameren Missouri’s systems are different
6 from those of Ameren Illinois, the fact that Ameren Illinois’s estimated project cost for a
7 modernized GBC solution of \$4.76 million, corresponding to an estimated revenue requirement
8 of \$476,000, indicates much uncertainty in how much a GBC implementation would cost. It is
9 Staff’s opinion that neither Ameren Missouri’s cost estimate, nor Renew’s proposed revenue
10 requirement of \$751,000 are reliable. Further, since any ordered GBC implementation would
11 occur well after the true-up period in this case, Staff recommends that no revenue requirement
12 for GBC be ordered in this case.

13 Q. Based on the engagement data provided by Mr. Allen, is the expenditure that
14 would be needed to provide GBC to customers reasonable?

15 A. It is not. Mr. Allen shows that very few of Ameren Missouri’s customers use
16 GBD currently, with only 0.1% of its total customers downloading data using GBD in 2024.³
17 Mr. Allen also provides information about the participation of Ameren Illinois’s GBC program.

18 ** [REDACTED]

19 [REDACTED] ⁴ Based on Staff Data Request (“DR”) 0692,
20 Ameren Illinois GBC program has been live since ** [REDACTED] **. Staff does not believe it makes
21 sense to spend any amount to implement a program that evidence shows is unlikely to be used.

³ ER-2024-0319. Rebuttal Testimony of Clark E. Allen. Page 7, lines 19-21.

⁴ ER-2024-0319. Rebuttal Testimony of Clark E. Allen. Page 8, lines 4-10.

1 Staff recommends that the Commission not require Ameren Missouri to pursue GBC at
2 this time.

3 **RESPONSE TO MR. WILLS' TESTIMONY REGARDING THE PROPOSED**
4 **RESIDENTIAL BATTERY STORAGE PILOT**

5 Q. Please summarize Mr. Wills' rebuttal testimony regarding RBSP.

6 A. In his rebuttal testimony Mr. Wills reiterates his sentiment that parties to this
7 case should not attempt to dictate what pilots Ameren Missouri offers. He also states that the
8 proposed RBSP is redundant due to Evergy Missouri's current pilot, and that the knowledge
9 gained through it can be extrapolated to Ameren Missouri's service territory.

10 Q. Does Staff agree with Mr. Wills that an RBSP offering by Ameren Missouri
11 would "largely duplicate that ongoing study [Evergy's battery pilot]"⁵?

12 A. No. There are some parts of Evergy's offering that could give Ameren Missouri
13 meaningful information about a future RBSP. For instance, it could give a general sense of
14 customer demand for the program that may be representative of Ameren Missouri's demand for
15 the program. However, much of Evergy's ultimate findings are likely to be confidential, so it
16 may not be available to Ameren Missouri, nor will Evergy's program provide any operational
17 experience to Ameren Missouri personnel. While Staff neither supports nor opposes an RBSP
18 by Ameren Missouri at this time, the redundancy of a potential Ameren Missouri RBSP is not
19 a compelling reason to oppose it.

20 Q. Does this conclude your surrebuttal testimony?

21 A. Yes, it does.

⁵ ER-2024-0319. Rebuttal Testimony of Steven Wills. Page 42, lines 8-9.

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 MATTHEW W. LUCAS

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW MATTHEW W. LUCAS 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 Matthew W. Lucas*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



MATTHEW W. LUCAS

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