

Exhibit No.:
Issue(s): Natural Gas Inventory
Witness: Jared Giacone
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: GR-2024-0369
Date Testimony Prepared: February 28, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDIT DEPARTMENT

DIRECT TESTIMONY

OF

JARED GIACONE

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

CASE NO. GR-2024-0369

*Jefferson City, Missouri
February, 2025*

1 **DIRECT TESTIMONY**

2 **OF**

3 **JARED GIACONE**

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

6 **CASE NO. GR-2024-0369**

7 Q. Please state your name and business address.

8 A. My name is Jared Giacone and my business address is 615 East 13th Street
9 Kansas City, MO 64106.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 a Lead Senior Utility Regulatory Auditor.

13 Q. What is your education and employment history?

14 A. Please refer to Schedule JG-d1, attached to this direct testimony for my
15 education and employment history information.

16 Q. Have you previously filed testimony before the Commission?

17 A. Yes, please refer to Schedule JG-d1, attached to this direct testimony, for a list
18 of the major audits on which I have assisted and filed testimony.

19 **EXECUTIVE SUMMARY**

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

21 A. The purpose of my direct testimony is to discuss my recommendation for natural
22 gas inventory.

1 **NATURAL GAS INVENTORY**

2 Q. What is natural gas inventory?

3 A. Natural gas inventory is an investment by the Ameren Missouri gas utility for
4 natural gas that is stored for use by its customers. The investment is included in rate base which
5 allows Ameren Missouri the opportunity to earn a return on its investment.

6 Q. Does the level of natural gas inventory fluctuate over time?

7 A. Yes, there is typically a build-up of inventory going into the colder winter
8 months and a draw down of inventory as the weather warms up going into the summer months.

9 Q. What level of natural gas inventory do you recommend to include in the cost
10 of service?

11 A. I analyzed the natural gas inventory levels and unit pricing over multiple years.
12 I recommend a 13-month average of natural gas inventory for both quantity and price for the
13 13-month period ending June 2024 to correspond with Staff's June 30, 2024, update period.
14 The 13-month average of quantity and price results in a normalized value for natural gas
15 inventory to include in rate base. Ameren also used a 13-month average of natural gas inventory
16 in its direct case for the test year ending March 31, 2024.

17 Q. Does this conclude your direct testimony?

18 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 Natural Gas Service) Case No. GR-2024-0369

AFFIDAVIT OF JARED GIACONE

STATE OF MISSOURI)
)
COUNTY OF Jackson) ss.

COMES NOW JARED GIACONE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Jared Giacone*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



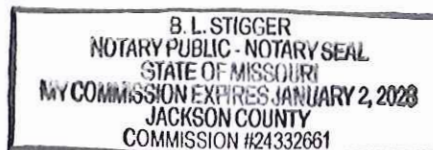
JARED GIACONE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 25th day of February 2025.



Notary Public



Jared Giaccone

Present Position:

I am a Lead Senior Utility Regulatory Auditor with the Missouri Public Service Commission. I have been employed by the Missouri Public Service Commission Since April 2019.

Educational Background and Work Experience:

I earned a Bachelor of Science degree in Business Administration with an emphasis in Accounting in 2007 from DeVry University in Kansas City, MO. I was previously employed in sales and finance operations for semi-truck dealerships. Prior to that, I was a Compliance Auditor with the Missouri Gaming Commission for 6 years.

Case Participation:

<u>Company Name</u>	<u>Case Number</u>	<u>Case Type</u>	<u>Utility Type</u>
Empire	ER-2024-0261	Rate Case	Electric
Ameren	GR-2024-0369	Rate Case	Gas
MRG Utilities, LLC	WA-2025-0090 SA-2025-0091	Certificate of Convenience and Necessity (CCN)	Water—New Utility Sewer—New Utility
Confluence Rivers Utility Operating Company, Inc.	SM-2025-0080	Certificate of Convenience and Necessity (CCN)	Sewer—Merger
Evergy Missouri West	ER-2024-0189	Rate case	Electric
Confluence Rivers Utility Operating Company, Inc.	SM-2024-0130	Acquisition of a regulated utility and transfer of Certificate of Convenience and Necessity (CCN)	Sewer—Merger
Confluence Rivers Utility Operating Company, Inc.	WA-2023-0450 SA-2023-0451	Certificate of Convenience and Necessity (CCN)	Water—Acquisition Sewer—Acquisition
Evergy Missouri Metro	EO-2023-0423	Other-Construction Audit	Electric
Evergy Missouri West	EO-2023-0424	Other-Construction Audit	Electric
Spire	GA-2023-0374	Certificate of Convenience and Necessity (CCN)	Gas—Expansion
Liberty Utilities (Midstates Natural Gas)	GT-2023-0229	Infrastructure System Replacement Surcharge (ISRS)	Gas
Ameren	ER-2022-0337	Rate case	Electric
Ameren	EC-2023-0037	Complaint	Electric
Evergy Missouri Metro	ER-2022-0129	Rate case	Electric
Evergy Missouri West	ER-2022-0130	Rate case	Electric
Evergy Missouri Metro Evergy Missouri West	EA-2022-0043	Certificate of Convenience and Necessity (CCN)	Electric—New Solar
Spire	GR-2021-0108	Rate case	Gas
Missouri-American Water Company	SA-2021-0074	Certificate of Convenience and Necessity (CCN)	Sewer— Acquisition
Spire	GO-2021-0030	Infrastructure System Replacement Surcharge (ISRS)	Gas
Raytown Water Company	WR-2020-0264	Rate case	Water
Spire	GO-2020-0230	Infrastructure System Replacement Surcharge (ISRS)	Gas
Spire	GO-2020-0229	Infrastructure System Replacement Surcharge (ISRS)	Gas
Empire	ER-2019-0374	Rate case	Electric

Spire	GO-2019-0357	Infrastructure System Replacement Surcharge (ISRS)	Gas
Spire	GO-2019-0356	Infrastructure System Replacement Surcharge (ISRS)	Gas