Exhibit No.: Issue(s): Update OPC Recommendation for Vegetation Management and Infrastructure Inspection Annual Expense Witness/Type of Exhibit: Robertson/True Up Direct Sponsoring Party: Case No.: ER-2014-0258

TRUE UP DIRECT TESTIMONY

OF

TED ROBERTSON

Submitted on Behalf of the Office of the Public Counsel

UNION ELECTRIC D/B/A AMEREN MISSOURI

CASE NO. ER-2014-0258

March 17, 2015

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service

Case No. ER-2014-0258

AFFIDAVIT OF TED ROBERTSON

STATE OF MISSOURI)) ss COUNTY OF COLE)

Ted Robertson, of lawful age and being first duly sworn, deposes and states:

1. My name is Ted Robertson. I am the Chief Public Utility Accountant for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my true up direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Ted Robertson, C.P.A. Chief Public Utility Accountant

Subscribed and sworn to me this 17th day of March 2015.



JERENE A. BUCKMAN My Commission Expires August 23, 2017 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My Commission expires August 23, 2017.

TRUE-UP DIRECT TESTIMONY OF TED ROBERTSON

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI CASE NO. ER-2014-0258

1	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	А.	Ted Robertson, P. O. Box 2230, Jefferson City, Missouri 65102.
3		
4	Q.	ARE YOU THE SAME TED ROBERTSON THAT HAS PREVIOUSLY FILED
5		DIRECT, REBUTTAL AND SURREBUTTAL TESTIMONY IN THIS CASE?
6	А.	Yes.
7		
8	Q.	WHAT IS THE PURPOSE OF YOUR TRUE-UP DIRECT TESTIMONY?
9	A.	The purpose of this true-up direct testimony is to update the Public Counsel's
10		recommendation for vegetation management and infrastructure inspection annual
11		expense.
12		
13	Q.	WHY HAS THE PUBLIC COUNSEL UPDATED ITS RECOMMENDATION FOR
14		THE ANNUAL LEVEL OF EXPENSE FOR THIS ISSUE?

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1	А.	Public Counsel has updated its recommendation to account for costs incurred by the
2		Company through the end of the Commission authorized true-up period – December 31,
3		2014.
4		
5	Q.	WHAT IS THE PUBLIC COUNSEL'S UPDATED RECOMMENDATION FOR THE
6		ANNUAL LEVEL OF EXPENSES?
7	A.	Public Counsel's updated recommendation for the annual level of expense (i.e., base
8		level if the tracker is continued) for vegetation management is \$53,114,501 and for
9		infrastructure inspection \$6,149,077.
10		
11	Q.	DID PUBLIC COUNSEL MODIFY THE METHODOLOGY IT UTILIZED IN
12		DEVELOPING ITS PREVIOUS RECOMMENDATIONS TO DEVELOP THE
13		UPDATED RECOMMENDATIONS?
14	A.	No. The vegetation management expense recommendation has been updated based only
15		on the addition of nine new months of expense history (i.e., April-December 2014);
16		whereas, the infrastructure inspections expense recommendation incorporates the
17		additional expense history to develop a new two-year average utilizing the twelve-
18		months-ended December 2013 and 2014.
19		
20	Q.	WHAT ARE THE MPSC STAFF AND COMPANY RECOMMENDATIONS FOR
21		THE ANNUAL LEVEL OF EXPENSES?

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1	A.	Based on the surrebuttal testimony of the parties, the MPSC Staff and Company
2		recommendations are as follows:
3		
4 5 6 7 8		Vegetation ManagementMPSC StaffCompanyInfrastructure Inspection\$54,504,662\$56,000,000\$5,827,267\$6,400,000
9	Q.	DOES THE MPSC STAFF RECOMMENDATION INCORPORATE ANY COSTS
10		INCURRED DURING THE AUTHORIZED TRUE-UP PERIOD?
11	A.	No. The MPSC Staff recommendation is based on a three-year average of the costs
12		incurred during the twelve-months-ended March 2012, 2013 and 2014.
13		
14	Q.	DOES THE COMPANY RECOMMENDATION INCORPORATE ANY COSTS
15		INCURRED DURING THE AUTHORIZED TRUE-UP PERIOD?
16	A.	Yes. Beginning on page 9, line 5, of her surrebuttal testimony, Company witness, Ms.
17		Laura M. Moore, states:
18		
19 20 21 22 23 24 25 26		 Q. The Company proposed to use the actual incurred amounts through the true-up period for the base levels of expense for the vegetation management and infrastructure inspections trackers. Is this correct? A. Yes. The actual incurred amount through the true-up period for vegetation management expenses is approximately \$56,000,000,
26 27 28		and for infrastructure inspections is approximately \$6,400,000. The Company proposes that these trued-up amounts be used for the base levels of expense for these trackers.

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1 2

3 Q. DOES THIS CONCLUDE YOUR TRUE-UP DIRECT TESTIMONY?

4 A. Yes.