

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: Public Counsel
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

**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 A. 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 A. 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?

1 A. 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?

1 A. Based on the surrebuttal testimony of the parties, the MPSC Staff and Company
2 recommendations are as follows:

	MPSC Staff	Company
4 Vegetation Management	\$54,504,662	\$56,000,000
6 Infrastructure Inspection	\$ 5,827,267	\$ 6,400,000

8
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 Q. The Company proposed to use the actual incurred amounts through
20 the true-up period for the base levels of expense for the vegetation
21 management and infrastructure inspections trackers. Is this
22 correct?

23
24 A. Yes. The actual incurred amount through the true-up period for
25 vegetation management expenses is approximately \$56,000,000,
26 and for infrastructure inspections is approximately \$6,400,000.
27 The Company proposes that these true-up amounts be used for the
28 base levels of expense for these trackers.

1

2

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

4 A. Yes.