Exhibit No.: Issue(s): Rate Design Witness: Keri Roth Sponsoring Party: MoPSC Staff Type of Exhibit: Rebuttal Testimony Case No.: GR-2024-0369 Date Testimony Prepared: April 4, 2025

## **MISSOURI PUBLIC SERVICE COMMISSION**

## **INDUSTRY ANALYSIS DIVISION**

## WATER, SEWER, GAS, & STEAM DEPARTMENT

**REBUTTAL TESTIMONY** 

OF

**KERI ROTH** 

UNION ELECTRIC COMPANY, d/b/a Ameren Missouri

CASE NO. GR-2024-0369

Jefferson City, Missouri April 2025

1	REBUTTAL TESTIMONY		
2	OF		
3	KERI ROTH		
4 5	UNION ELECTRIC COMPANY, 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 Keri Roth and my business address is 200 Madison Street,		
9	P.O. Box 360, Jefferson City, Missouri 65102.		
10	Q. By whom are you employed and in what capacity?		
11	A. I am employed by the Missouri Public Service Commission ("Commission")		
12	as a Lead Senior Utility Regulatory Auditor in the Water, Sewer, Gas, and Steam Department,		
13	Industry Analysis Division.		
14	Q. Are you the same Keri Roth who filed Class Cost of Service and Rate Design		
15	direct testimony filed March 14, 2025, in this case?		
16	A. Yes, I am.		
17	Q. What is the purpose of this rebuttal testimony?		
18	A. The purpose of this rebuttal testimony is to respond to Union Electric Company,		
19	d/b/a Ameren Missouri's ("Ameren Missouri") witness, Michael W. Harding,		
20	regarding rate design.		
21	RATE DESIGN		
22	Q. What rate design does Ameren Missouri currently have?		

# Rebuttal Testimony of Keri Roth

1	A. Ameren Missouri currently has five rate classes each with their own rate				
2	structure. The rate classes include Residential Service, General Service, Interruptible,				
3	Standard Transportation, and Large Volume Transportation. Each class includes a monthly				
4	customer charge and a volumetric delivery charge. For all classes except Residential Service,				
5	the volumetric delivery charge has two tiers divided at the 7,000 hundred				
6	cubic feet ("Ccf") threshold. <sup>1</sup>				
7	Q. What rate design changes is Ameren Missouri proposing in this case?				
8	A. Ameren Missouri is not proposing any overall changes to the existing rate				
9	classes or rate structures. <sup>2</sup>				
10	Q. Can you please contrast Ameren Missouri's proposed rates with Staff's				
11	proposed rates?				
12	A. Yes. Residential Service, General Service and Interruptible Service classes each				
13	received an equal percentage increase to each rate element in its class, based on its calculated				
14	cost of service. Ameren Missouri increased each rate element in each class by approximately				
15	50.93%. Staff increased each rate element in each class by approximately 36.14%.				
16	The main differences between Staff and Ameren Missouri's approach to increasing rates				
17	falls within the Standard Transportation and Large Volume Transportation rate classes.				
18	Staff continued its proposed equal percentage increase to each rate element in each class,				
19	increasing each rate element by approximately 36.14%. Ameren Missouri,				
20	however, has included adjustments for rate switching and revenue neutral shifts between the				
21	two classes, as well as kept some rate elements constant. For example, the monthly				

 <sup>&</sup>lt;sup>1</sup> Michael W. Harding, Ameren Missouri Direct Testimony, pages 5 – 6.
<sup>2</sup> Michael W. Harding, Ameren Missouri Direct Testimony, page 5, lines 6 – 7.

Rebuttal Testimony of Keri Roth

1	Administration Charge for the electronic gas meter, within each class was kept constant.		
2	Additionally, Ameren Missouri kept the School Entities rate constant under		
3	Standard Transportation, as well as the monthly Customer Charge for the Large Volume		
4	Transportation rate class. Ameren Missouri also kept the initial rate block amongst all		
5	non-residential classes consistent to help disincentivize rate switching.		
6	Q. Did Staff make any changes to its proposed rate design to		
7	disincentivize rate switching?		
8	A. Similar to Ameren Missouri, Staff also kept the initial rate block amongst all		
9	non-residential classes consistent to help disincentivize rate switching.		
10	Q. Does this conclude your rebuttal testimony?		
11	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)Case No. GR-2024-0369Its Revenues for Natural Gas Service)

### AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI	)	
	)	SS.
COUNTY OF COLE	)	

**COMES NOW KERI ROTH** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Keri Roth*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

#### 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 151 day of April 2025.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070

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