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Issue(s):	Discrete Adjustment – Billed Revenue
Witness:	Steven M. Wills
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2024-0369

REBUTTAL TESTIMONY

OF

STEVEN M. WILLS

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

St. Louis, Missouri
April, 2025

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REBUTTAL TESTIMONY

OF

STEVEN M. WILLS

FILE NO. GR-2024-0369

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Steven M. Wills. My business address is One Ameren Plaza, 1901 Chouteau Ave., St. Louis, Missouri.

Q. Are you the same Steven M. Wills that submitted direct testimony in this case?

A. Yes, I am.

Q. To what testimony or issues are you responding?

A. My rebuttal testimony responds to Staff witness Matthew Young's testimony related to discrete adjustments beyond the true-up date established in this case and to Staff witness Kimberly Tones' testimony related to the Company's process for determining billed revenue.

II. DISCRETE ADJUSTMENTS

Q. Please provide a brief reminder of the Company's proposal for a discrete adjustment to the rate base used to set the revenue requirement in this case that relates to a project that will be completed after the true-up date.

A. The Company has been conducting a major upgrade to the capacity that serves its Northeast Gas System in and around Wentzville, Missouri. This upgrade is being placed in service in three phases.[1] The first phase of the project was completed prior to the true-up date in this case and is not the subject of any dispute among the parties to this case. The second phase ("Phase 2") was not in service as of the true-up date in this docket, but will go into service before rates take effect. Phase 2 represents a large capital investment that will represent a significant increase in the Company's rate base once in service. The Company proposed to make a discrete adjustment to the rate base in this case, recognizing the importance of reflecting this investment in this case as a critical component of ensuring that rates from this case give the Company an opportunity to recover its prudently incurred costs and earn a reasonable return on the investments that will be providing service to customers when rates from this case take effect. I also provided evidence in my direct testimony that the timing of the in-service dates of the first two phases of the Northeast Gas System projects do not allow the Company to reasonably minimize its regulatory lag if it were to have separate rate cases for each phase. Further, I testified that making this discrete adjustment has the potential to allow the Company to delay its next gas rate case filing by up to a couple years, whereas a subsequent case in the near term may be needed if the discrete adjustment is not adopted in this case.

Q. What position did Staff take with respect to the Company's request for a discrete adjustment in its direct testimony?

A. Staff witness Matthew Young indicated in his direct testimony that Staff's position is that the inclusion of the Phase 2 investment in this case is not appropriate. Additionally, witness Young recommended that, if the Commission did adopt the Company's proposal despite Staff's primary recommendation, the Commission adopt several additional

[1] The third phase of this project is not contemplated in this case at all.

adjustments that more than entirely offset the revenue requirement impact of the Phase 2 adjustment.

Q. What was Staff's rationale for its position on the discrete adjustment?

A. Staff witness Young provided two criteria that Staff considers in order to determine the need for a discrete adjustment in a utility rate case. The first is whether the adjustment is known and measurable. The second is that the timing should not skew the matching principle in relation to other cost of service items. Witness Young also references a prior Commission order related to discrete adjustments and the retirement of the Asbury generating plant in a past Empire District Electric Company rate case, File No. ER-2019-0374 ("the Asbury order"). The criteria identified by the Commission related to the inclusion of discrete adjustments include determinations that the adjustment:

1) is known and measurable;

2) promotes the proper relationship of investment, revenues and expenses; and;

3) is representative of the conditions anticipated during the time the rates will be in effect.[2]

In the Asbury order, the Commission further stated the following:

> When setting rates, the choice of method to adjust the test year for known and measurable changes is a factual determination within the Commission's expert discretion. The Commission is not required to recognize and incorporate all known and measurable events outside the test year **so long as the results are rates that are just and reasonable.**[3] [emphasis added]

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[2] File No. GR-2024-0369, Matthew Young Direct Testimony, p. 6, ll. 2-8.
[3] File No. ER 2019-0374, *Amended Report and Order*, p. 113, issued July 23, 2020.

Q. Does the Company's proposed discrete adjustment meet the Commission's three criteria?

A. Yes. As Phase 2 will go into service before rates take effect from this case, the Phase 2 investment will be known and measurable and inclusion of the Phase 2 investment in rate base is representative of the conditions anticipated during the time the rates will be in effect. Due to the procedural schedule timing for this case, it is possible that small changes to the total project cost could occur after the Commission has necessarily determined the Phase 2 investment amount to include in rate base in this case, but before new rates take effect.[4] Accordingly, the Company is proposing a one-way tracker to track any potential over-recovered amounts from a Phase 2 investment amount included in rate base that ends up being greater than the final project cost for refund in a future case as discussed in the testimony of Company witness Stephen Hipkiss.

Q. What observations would you share related to witness Young's discussion of the Staff's and the Commission's criteria related to discrete adjustments?

A. There are certainly similarities between the criteria that witness Young indicates that Staff considers and those espoused by the Commission's order. However, it is unclear whether Staff's reference to the matching principle is intended to represent a different standard than the one the Commission articulated in the Asbury order, which called for maintaining the proper relationship between investment, revenues and expenses. Further, Staff omits any analysis regarding the third criterion articulated in the Asbury order, which is that the adjustment be representative of conditions anticipated during the time when rates are in effect.

[4] For example, due to late charges received for the project or cost adjustments for incomplete punch list items.

To the extent that Staff intends its reference to the matching principle to be a different standard than the Commission's second criterion from the Asbury order, I can only presume that it intends for a strict matching of the time period used to examine investment (i.e., rate base), revenues and expenses, which is inconsistent with the Commission's criterion and reasoning. If that is the case, the effect would be to render discrete adjustments almost (or perhaps entirely) impossible under Staff's criteria. By its very nature, a discrete adjustment *always* violates a strict adherence to the matching principle if there is a hard and fast cutoff date imposed – and therefore no discrete adjustment would ever qualify for implementation under such a criterion. Witness Young described the concept of a discrete adjustment as both "out-of-period" and "isolated." Each of these words ("discrete", "out-of period", "isolated") explicitly means that the adjustment does not precisely *match* in timing with the rest of the investments, revenues, and expenses reflected in the test year or true-up period of the case. An adjustment simply would not be called out as a "discrete adjustment" nor require any special consideration by the Commission if it strictly adhered to a formulaic interpretation of the matching principle.

I would again draw attention to the nuanced difference between Staff's invocation of the matching principle and the Commission's prior criterion that suggests a discrete adjustment should "promote the proper relationship between investment, revenues and expenses."

Q. Under what circumstances might an adjustment that technically violates strict and formulaic application of the matching principle still promote a proper relationship of these cost of service elements?

A. When the adjustment relates to an investment, cost, or revenue that is so significant that it is impossible to even pretend like just and reasonable rates that provide the utility an opportunity to recover its prudently incurred costs and earn a reasonable return on its investment can be established without its inclusion in rate base and/or the revenue requirement. Said another way, a discrete adjustment may promote the proper relationship of investment, revenue, and expense items when that discrete adjustment is obviously disproportionate to any "normal course of business" cost or revenue increases or decreases that might be occurring contemporaneously.

Q. Does this last point coincide with the third criteria identified by the Commission in the Asbury order for the appropriate conditions for a discrete adjustment?

A. Yes. The third factor the Commission identified in the Asbury order, which Staff failed to recognize, is that the discrete adjustment is representative of the conditions anticipated during the time when rates will be in effect. There is no dispute that Phase 2 is expected to provide service to customers when rates from this case take effect, and failure to recognize the investment in the rate base used to establish the revenue requirement in this case would violate this Commission-identified criteria, i.e., that rates contemplate the conditions that will exist when those rates are in effect. Failure to recognize this condition that will exist when rates take effect from this case will also fail to provide the Company an opportunity to earn a reasonable return, as may be established by the Commission in this case, on that investment from the very first moment that rates take effect.

Q. Is the Phase 2 project significant enough to warrant a discrete adjustment?

A. Absolutely. As I mentioned in my direct testimony, the discrete adjustment alone accounts for almost one-tenth of the Company's proposed rate base in this case. As I also discussed in my direct testimony, the investment for the Phase 2 project is significant enough that it alone could potentially drive the Company's need for a subsequent near-term rate case if it were not included in this case. That underscores the criticality of its inclusion in the ratemaking process to the Company's opportunity to recover its prudently incurred costs and earn a reasonable return on its investments used to provide service to its customers. Statutorily required surveillance reporting expresses regulatory lag and unrecovered costs in terms of a Company's earned return on equity ("ROE") (as compared to a Company's authorized ROE). Evaluation through the lens of surveillance reporting indicates that if the Phase 2 project is not included in the rate base used to establish the revenue requirement in this case, and all other costs and revenues from the Company's revenue requirement analysis in this case were held constant when rates take effect, the Company's earned ROE would be 162 basis points below its authorized ROE. Indeed, rather than earning the 10.25% ROE that the Company requested (and would be authorized to earn if the Commission otherwise ordered an outcome consistent with the Company's case), the best the Company could hope to earn without some other unlikely and extraordinary decrease in its costs or increases to its revenues would be only 8.63%. I say that it would be unlikely and extraordinary for the Company to overcome that earned versus allowed ROE gap because, in my experience, and as I think the Commission generally understands, inflationary pressures and needed investment in the system are causing utilities to operate in an inclining cost environment that results in regulatory lag eroding its earnings below the level authorized in historical test year rate cases, irrespective of a headwind like that which would exist for the Company if the discrete adjustment for Phase 2 is not included in this case. Such an outcome in this case would effectively ensure that the Company does not have a reasonable opportunity to recover its costs and earn a reasonable return on investments serving customers when rates take effect.

Q. As you previously mentioned, as an alternative to its proposal to exclude the Company's discrete adjustment from this case, Staff provides a number of its own adjustments that it proposes as offsets to the impact of the discrete adjustment. Do these adjustments meet the criteria identified by the Commission in the Asbury order for discrete adjustments?

A. No, many of Staff's adjustments do not meet those criteria. Staff's adjustments should be analyzed through the same lens as the Company's – i.e., through the criteria articulated in the Asbury order. Isolated or discrete adjustments should be fair and balanced, in that they should be either so significant that they overwhelm the potential for offsetting "normal course of business" cost and revenue increases or decreases, or they should be directly related or tied to the discrete adjustment proposed by the Company, so that it is keeping in the spirit of promoting the proper relationship of investment, revenue and expenses. Several of Staff's adjustments clearly violate the Commission's criterion to promote the proper relationship of investments, revenues and expenses.

Q. How so?

A. Company witness Stephen Hipkiss discusses the details of each adjustment. But generally, many of Staff's adjustments are based on trending analyses whereby it projects forward normal, ordinary course of business, changes in costs and revenues. These are the very type of costs and revenues for which it is generally appropriate to carefully observe the matching principle, and which do not individually meet the standards or carry the significance to warrant consideration as discrete adjustments. These types of trending analyses *may* be appropriate for a case including a forecasted test year,[5] where forward-looking adjustments of all or large baskets of major categories of investment, revenue, and expense are contemplated. But they most certainly do not warrant consideration as discrete adjustments. And several of the adjustments, as witness Hipkiss details, are one sided views of two-sided issues, whereby Staff recognizes cost decreases that may arise in the normal course of business while failing to consider cost increases that are nearly certain to be occurring contemporaneously.

Q. Please summarize your testimony related to the discrete adjustment issue.

A. The criteria identified by the Commission for discrete adjustments in the Asbury order are appropriate, and they also fully justify the inclusion of a discrete adjustment in this case for the Phase 2 project. The project costs are known and measurable, are reflective of conditions that we know will be in effect when rates take effect from this case, and are essential to establishing the proper relationship of investment, revenues, and expenses in this case. Absent the discrete adjustment, it cannot be said that the rates that will take effect from this case will provide an opportunity for the Company to recover its prudently incurred costs and earn a reasonable return on its investment, as may be established by the Commission in this case, used to provide service to customers when the rates from this proceeding are in effect.

III. BILLED REVENUE

Q. What issue is raised in the direct testimony of Staff witness Tones that you will address?

[5] I say that they *may* be appropriate in the context of a forecasted test year because, for it to be reasonable to include these types of trend-based forecasts of cost decreases in a forecasted test year, it would also be necessary to include forecasts of factors that are increasing costs contemporaneously.

A. Staff witness Tones alleges issues with the way the Company records billed revenues within its general ledger. This issue is further addressed by Company witnesses Harding and Hipkiss. But I will provide some important perspective on this issue as well.

Q. Please describe the issue as simply and succinctly as you can?

A. Each customer of the Company is billed once per month. The Company's general ledger reflects the revenues from that periodic monthly billing of each customer as billed revenue associated with a given month, such that each month represents the revenue associated with one bill each for the full population of customers.[6] The bills, however, are rendered on different days for different customers. This is typical of almost all utilities and makes perfect operational sense. It would make little practical sense at all and be completely inefficient from a cost perspective for the Company to process meter readings and render and mail bills on one day a month for all customers, and then leave its billing apparatus idle for the rest of the month. Indeed, prior to the advent of automated meter reading, it would literally have been impossible (absent dramatically over-staffing with meter readers for one day per month) to bill all customers at the same time. This reality has resulted in customers being grouped into twenty-one[7] "billing cycles" (i.e., groups of customers whose meters are read and bills rendered at the same time[8]). The Company's billing system has been utilized in a consistent fashion to conduct this periodic monthly billing process for years, if not decades, for the Company's electric and

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[6] Under any billing paradigm, operational realities mean that the population being billed is not perfectly reflected each month, meaning that bills for relatively small numbers of customers may be delayed so as not to be reflected in one month and might therefore show up twice in another. But the Company's system is designed to reasonably achieve the result of one bill per customer per month being reflected in billed revenue.

[7] Twenty-one billing cycles aligns with the average number of non-holiday weekdays in a month that represent typical monthly working days.

[8] For technical reasons described in Schedule SMW-R1, not all customers within a billing cycle are always literally read on the same day.

gas operations, as well as for the operations of its affiliate electric and gas utilities in Illinois. The process works and the process is efficient.

Suddenly, in Staff's 2023 Actual Cost Adjustment ("ACA") audit, and here in this case, Staff has become fixated on the nature of this periodic billing and has alleged that the Company's method for assigning bills to a billing month is somehow inappropriate. However, this primarily seems to be a result of certain customer bills showing up on the Company's general ledger in months that were not consistent with Staff's "expectations." The Company's billing system is indeed complex and may result in outcomes that are not immediately intuitive to someone that does not fully understand the Company's billing operations. Yet the billing system does have systematic and repeatable logic that effectively classifies billed revenue appropriately. The fact that that classification is sometimes "unexpected" to Staff is not evidence of a flawed system.

Q. Staff witness Tones indicates that she has a simple and cost effective solution to the problem she alleges to have identified. She further states that the Company has not explained to her why her solution cannot be implemented. What is your reaction?

A. What witness Tones has identified is a solution to a problem that does not exist. Again, the fact that the classification of certain bills into certain revenue months is not immediately intuitive and therefore does not line up with Staff's expectations is not evidence of a problem. Further, the purported solution witness Tones offers would cause catastrophic levels of chaos (and therefore costs) in the Company's billing system and downstream reporting efforts, as further detailed in Ameren Missouri witness Harding's testimony. Finally, I am perplexed by witness Tones allegation that the Company has failed to explain to Staff why her solution is not viable. I personally have spent hours discussing this issue with Staff, including Ms. Tones. Schedule SMW-R1 is a PowerPoint presentation that I walked through with Staff during the pendency of the 2023 ACA Audit that details the reason the Company's system functions the way it does, and which explains why this system is totally appropriate.

Q. Did the Company get any more insights into Staff's proposed solution subsequent to the filing of Staff's direct testimony in this case?

A. Yes. The Company issued Data Requests 290-296 to better understand Ms. Tones' proposal. The Company asked her to take an historical year's meter read schedule and map the billing cycles to the billing months that they should be reported in to avoid the bills that are recorded in a manner that is counter to Staff's expectations. The response was illuminating. Staff did reorganize the billing cycles in the Company's 2024 meter reading schedule into billing months differently than the Company originally organized them, in the manner that Staff says would address its concern. The result, however, would *not result in each customer being billed once in each billing month.* Table 1 below shows how many of the Company's 21 billing cycles would have had *any* billed revenue recorded in each billing month of the year 2024 under Staff's proposed solution.

Table 1 – Staff Solution to Billing Cycle "Issue" Provided in Response to DR 290

Billing Month	# of Billing Cycles Scheduled for Billing
01/01/2024	22
02/01/2024	21
03/01/2024	20
04/01/2024	22
05/01/2024	22
06/01/2024	19
07/01/2024	22
08/01/2024	22
09/01/2024	20
10/01/2024	23
11/01/2024	19
12/01/2024	20

Table 1 illustrates that Staff's solution would not result in the full population of customers to be scheduled for billing, to be billed, or to be reported in the revenues reflected in the general ledger, once in each billing month. Rather, there would be arbitrary variation in the number of customers that were included in each month's billed revenue. It is critical for a number of reasons that each month's billed revenue reflect a complete billing of the population of customers.[9] Implementation of Staff's simple solution would fundamentally change the nature of what monthly billed sales would represent – from a full cycle of billing the population of customers to a snapshot of the billing of some random number of billing cycles with no month to month consistency. A change to such an approach would wreak havoc on internal processes and reporting and make it virtually impossible to make meaningful comparisons of billed revenue across different periods, including in ACA audits. Staff's concerns and proposal related to changing the billing paradigm must be dismissed once and for all.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

[9] Subject to small operational variations.

Billing Cycle / Meter Reading Schedule Logic Explanation

January 26, 2024

Billing Cycle Basics / History

- Each customer is assigned to a billing group (cycle) that dictates when their meter is to be read
- This practice arises from utility history, where meters were manually read, and meter readers had to walk the service territory to collect those readings
- Meter readers were assigned a route to cover to read all meters within a particular geographic area on each workday of the month
  - With an average of 21 working days in a month, each reader could walk 21 routes each month, ensuring that all meters were read (or at least attempted to be read) and bills could be issued monthly

Billing Cycle Basics / History

Schedule SMW-R1

- An annual schedule is developed to best fit the 21 cycles within the workdays in a month
  - Due to variable month lengths and the timing of weekends and holidays, the 21 dates on which meters are read necessarily do not always fall within the calendar month
    - Cycle 21 may be read on, for example, day 27 of a 31-day month (see December 2023)
      - If the 28th is still a workday (non-holiday weekday), the schedule would require cycle 1 of the following month (January 2024) to be read that day (December 28th)
      - Since a December bill was already rendered for cycle 1 customers in this example, the bill based on a December 28th meter reading date necessarily is the "January" bill

In this example, the January "billing month", or "revenue month" begins with bills processed beginning on December 29th. For every month, the parameters of what dates a bill can be processed and fall within that billing month are well-defined in our system and subject to a published calendar like the one shown here

DATE	DAY	REVENUE MONTH	METER DOWNLOAD	FIRST READ DAY	SECOND READ DAY	SCHEDULED READ DAY	METER UPLOAD & BILL PROCESSING	MAIL DATE
12/20/2023	WED	Dec-23	21	20	19	18	17	16
12/21/2023	THU	Dec-23	1	21	20	19	18	17
12/22/2023	FRI	Dec-23						
12/23/2023	SAT	Dec-23						
12/24/2023	SUN	Dec-23						
12/25/2023	MON	Dec-23						
12/26/2023	TUE	Dec-23	2	1	21	20	19	18
12/27/2023	WED	Dec-23	3	2	1	21	20	19
12/28/2023	THU	Dec-23	4	3	2	1	21	20
12/29/2023	FRI	Jan-24	5	4	3	2	1	21
12/30/2023	SAT	Jan-24						
12/31/2023	SUN	Jan-24						
01/01/2024	MON	Jan-24						

Billing Cycle Basics

- There are other operational and financial reasons for billing customers in billing cycles in addition to the historical manual meter reading challenge
- Business processes associated with billing are spread out across the month under the 21-cycle paradigm
    - Helps manage workflow for customer accounts department that verifies bill accuracy, works exceptions, etc.
    - Bill printing and delivery activities spread out over the month
    - Payment due dates become naturally staggered for customers resulting in steadier payment processing work activities and more even cash flow for financing predictability
- These benefits of the use of billing cycles still exist even in a world where automated meter reading obviates the need to walk routes to manually read meters
- IT systems' core logic has been designed around business practices associated with 21-cycle billing

Automated Meter Reading (AMR)

- In the late 1990s, Ameren Missouri made its first investment in Automated Meter Reading (AMR) technology that reduced or eliminated the need to have meter readers walk routes to collect meter reads each month
- Billing cycles were maintained both due to the legacy of meter readers around which our systems and business processes had been designed, but more importantly, to continue to capture the operational and financial benefits of staggered billing and collection practices that smoothed workflows and cash flows across a month
- AMR deployment brought new and different challenges than existed in the manual meter reading environment

Window Billing

- AMR networks had a high degree of reliability – but issues still existed that meant delivery of automated meter readings was imperfect
  - Some meter readings could not be delivered/obtained on the scheduled read dates due to a variety of technical and practical realities
- Window billing – the concept of defining multiple dates within a month on which meters in a given billing cycle could be read for billing purposes, increased the proportion of actual meter reads that would be available to be delivered over the AMR network without manual intervention (cost) to read the meter (or a need to estimate bills)
- The AMR system would attempt to obtain a reading suitable for billing each day in a four-day window
- This “billing window” overlays on the meter read schedule such that on a given working day, there is 1 cycle scheduled for reading (as if the meter readers were walking that route that day), but multiple cycles are within the window that can be read that day and still used to generate a bill if a valid read can be acquired over the network (see graphic on slide 3)
  - In this way, practically speaking cycles can overlap, but the possible dates for a customer’s meter reading for the billing month are still narrowly and well-defined, but maintain the flexibility to increase the success rate of remote readings

Revenue Reporting Under a Billing Cycle Paradigm

Schedule SMW-R1

- The billing systems are indeed complicated, but are also very well defined to ensure the utility's ability to bill each customer 12 times a year on appropriate monthly intervals
- Reporting is also complicated, but flexible and effective in providing information in different views for different purposes
- Reporting usage or revenue in a given "billing" or "revenue" month does not mean that all service was delivered within that month (that is calendar usage/revenue) or that all meters were read within that calendar month (an impossibility under the 21-billing cycle paradigm due to the varying month lengths and weekday/holiday timing)
  - It does mean that meters were read according to a well-defined monthly schedule that results in each customer being billed 12 times per year on appropriate monthly intervals
    - It's less important that we call a billing month "January" or "February", but rather perhaps better to think of it as billing month 1 and billing month 2 of the year
      - Billing month 1 and 2 are subject to defined and predictable schedules that systematically cover all customers and bills (however, we do close the books and book that revenue to a month with a name like "January", so we will probably continue to live in a world where people talk about January billed revenue rather than billing month 1 revenue)

Customer impact of billing cycles

- Whether a bill is labeled for revenue reporting purposes as a, for example, December bill or a January bill is an internal issue that customers have no visibility into, nor impact from
- Customers need to have 12 bills a year at appropriate monthly intervals, consistent with Commission rules governing utility billing practices – our system accomplishes that very effectively
- Prior to the change to Ameren Missouri's electric tariffs to prorate the seasonal application of rates based on calendar dates, there was an impact on customers from this issue where it could dictate which month was subject to summer versus non-summer pricing
  - Tariff changes from ER-2019-0337 **eliminated this issue**
  - Rate application is not impacted by which billing cycle or revenue month they are billed in
  - Ameren Missouri's gas rates are not seasonally differentiated

Need to Change the System?

Ameren MISSOURI

- The 21-billing cycle system promotes efficiency of work processes across a wide variety of business functions within the company with many benefits in terms of workflow and cashflow
- It is not clear how a replacement system could be structured that would have workable and efficient business practices, ensure 12 bills per customer per year, but would also force meter readings to be guaranteed to occur in the month that matches the revenue month name they are reported within
  - It is also not clear what customer benefits would be derived from making such a change, if it could be successfully defined and designed
- IT systems are programmed with these business practices as a foundation
  - Any changes that alter core logic in the billing system (and other related systems) can become *extremely* costly and resource intensive quickly

Summary

- Business practices have evolved over a long history based on a variety of business needs, but have resulted in well-defined processes and systems – they are complex to be sure, and at times hard to understand without taking a deep dive to work through that complexity – but they work well
- Existing systems and business practices have many benefits in terms of workflow and cashflow timing
- No direct customer impact from what revenue month their bill is accounted within
- Current revenue reporting is well-defined and predictable, and comprehensive of all customers, bills, usage, and revenue
- Existing system logic, meter reading schedules, and business practices are appropriate

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	)	File No.: GR-2024-0369
Revenues for Natural Gas Service.	)	

AFFIDAVIT OF STEVEN M. WILLS

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Steven M. Wills being first duly sworn on his oath, states:

My name is Steven M. Wills, and hereby declare on oath that I am of sound mind and lawful age; that I have prepared the foregoing *Rebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

/s/ Steven M. Wills
Steven M. Wills

Sworn to me this 2nd day of April 2025.