

Exhibit No.:
Issue(s): *True-Up: Retail Revenue
Growth, Insurance
Expense, Uncollectible
Expense*
Witness: *Benjamin H. Burton*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal/True-Up Direct
Testimony*
Case No.: *GR-2024-0369*
Date Testimony Prepared: *May 2, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

SURREBUTTAL/TRUE-UP DIRECT TESTIMONY

OF

BENJAMIN H. BURTON

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

CASE NO. GR-2024-0369

*Jefferson City, Missouri
May 2025*

1
2
3
4
5
6
7
8
9

TABLE OF CONTENTS OF
SURREBUTTAL/TRUE-UP DIRECT TESTIMONY OF
BENJAMIN H. BURTON
UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri
CASE NO. GR-2024-0369

Annualized Retail Revenue – Customer Growth.....1

Insurance Expense2

Uncollectible Expense2

1 **SURREBUTTAL/TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **BENJAMIN H. BURTON**

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 Benjamin H. Burton and my business address is 111 North 7th Street,
9 Suite 105, St. Louis, MO 63101.

10 Q. Are you the same Benjamin H. Burton that filed Direct testimony
11 February 28, 2025 in this case?

12 A. Yes, I am.

13 Q. What is the purpose of your surrebuttal/true-up direct testimony?

14 A. I have no surrebuttal testimony. My true-up direct testimony will provide Staff's
15 positions regarding customer growth as applied to updated normalized usage per customer in
16 determining annualized retail revenue; insurance expense; and uncollectible expense that has
17 been reviewed as part of Staff's true-up audit.

18 Q. What was the true-up period that Staff performed the true-up audit through?

19 A. Staff reviewed and performed a true-up audit utilizing data through
20 December 31, 2024.

21 **ANNUALIZED RETAIL REVENUE – CUSTOMER GROWTH**

22 Q. Has Staff updated its position on the amount of annualized retail revenue to
23 include in the cost of service?

1 A. Yes. As mentioned in the rebuttal testimony of Melissa J. Reynolds,¹
2 Staff intended on addressing rate switching as part of its true-up audit. Please refer to her
3 Surrebuttal/True-Up Direct testimony for further discussion regarding Staff's rate switching
4 analysis. I reviewed customer counts by pipeline to assess customer growth in order to apply
5 customer growth to the normalized usage per customer supplied by Staff witness
6 Melissa J. Reynolds. Staff has included the updated customer counts by pipeline for each
7 month through December 31, 2024, in its calculation of true-up annualized retail revenue.

8 **INSURANCE EXPENSE**

9 Q. Has Staff updated its position on insurance expense?

10 A. Yes. Staff has updated its position to include the annual amount of insurance
11 expense based on current insurance policies through December 31, 2024.

12 **UNCOLLECTIBLE EXPENSE**

13 Q. Has Staff updated its position on uncollectible expense?

14 A. Yes. After analysis of the updated data, Staff has updated its position on
15 uncollectible expense by including the twelve months ending December 31, 2024, in the cost
16 of service.

17 Q. Does this conclude your surrebuttal/true-up direct testimony?

18 A. Yes, it does.

¹ Melissa J. Reynolds Rebuttal Testimony, pages 4-5.

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-2024-0369
Its Revenues for Natural Gas Service)

AFFIDAVIT OF BENJAMIN H. BURTON

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

COMES NOW BENJAMIN H. BURTON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Benjamin H. Burton*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

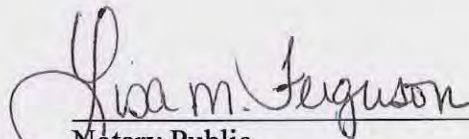


BENJAMIN H. BURTON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of St. Louis, State of Missouri, at my office in St. Louis, on this 29th day of April 2025.





Notary Public