

Exhibit No.:
Issue(s): Rate Base, Discrete
Adjustment
Witness: Pamela Harrison
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: GR-2024-0369
Date Testimony Prepared: May 2, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2024-0369

SURREBUTTAL TESTIMONY

OF

PAMELA HARRISON

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
May 2, 2025**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PURPOSE OF TESTIMONY	1

SURREBUTTAL TESTIMONY

OF

PAMELA HARRISON

FILE NO. GR-2024-0369

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Pamela Harrison. My business address is One Ameren Plaza,
1901 Chouteau Ave., St. Louis, Missouri.

**Q. Are you the same Pamela Harrison that submitted rebuttal testimony
in this case?**

A. Yes, I am.

II. PURPOSE OF TESTIMONY

Q. To what testimony or issues are you responding?

A. This testimony is to address the issues raised in OPC witness John S. Riley's
rebuttal testimony in regard to the forward-looking discrete adjustment for Phase 2 of the
Northeast Territory Gas Reliability Upgrade Project.

**Q. What position did OPC take with respect to the Company's request for
Phase 2 of the Northeast Territory Gas Reliability Upgrade project in its rebuttal
testimony?**

A. OPC witness John S. Riley indicated in his rebuttal testimony that the
inclusion of the Phase 2 investment in this case is not appropriate.

1 **Q. What was OPC's rationale for its position on the discrete adjustment?**

2 A. OPC witness John S. Riley indicated that the project is too substantial and
3 too far out of the audit period to be considered in the case, citing that it is not uncommon
4 for midstream pipeline companies to have substantial delays and cost overruns on a
5 pipeline project. Additionally, Mr. Riley states that the Company's arguments for including
6 Phase 2 are inconsistent, that Phase 2 would provide no additional functionality beyond
7 what is already in place and therefore, are unnecessary for providing safe, reliable service.

8 **Q. Please clarify the reliability need for Phase 2 and additional**
9 **functionality that it provides to the northeast territory gas system.**

10 A. In his rebuttal testimony, Mr. Riley ascertains that since Ameren Missouri
11 didn't experience operational problems on the Northeast system during Storm Uri in
12 February 2021, additional upgrades such as Phase 2 of the Northeast Gas Reliability
13 Upgrade project are not necessary to continue to maintain reliable gas service to the
14 customers served by that system. He states that "an increase in gas supply, combined with
15 the extra capacity of phase 1, has eliminated a current need for phase 2."¹ Mr. Riley's
16 opinion is a gross oversimplification that is not grounded in any analysis of the
17 fundamentals driving the needs of the communities served by the northeast system, and is
18 therefore incorrect. While it is true that downstream system upgrades such as loop feeds
19 into the subdivisions where outages occurred in the winter of 2018, feeder system uprates,
20 additional supply sources, and the construction of Phase 1 provided the downstream
21 pressure support to prevent reliability issues on peak days during the winters since 2018,
22 the system still must be further upgraded to provide that same reliability as additional

¹ File No. GR-2024-0369, Rebuttal Testimony of John S. Riley, p. 7, ll. 9-10.

1 customer load growth is experienced on the system. Mr. Riley failed to take into account
2 that as load growth occurs on the system, additional capacity is required to support that
3 load. After analysis of several alternatives, the 3-phase northeast gas reliability project was
4 selected to provide that increased capacity necessary for reliable service. The current
5 system configuration with Phase 1 in-service did successfully handle peak winter loads
6 throughout the winter of 2024-2025. However, the system model has been updated with
7 actual connected load on the system as well as anticipated load growth (representative of
8 past average load growth experienced over the last 5 years) expected to occur prior to
9 winter of 2025-2026. This model of the current system with Phase 1 in-service indicates
10 service to customers could be compromised on peak days during the winter of 2025-2026
11 without the increased capacity provided by Phase 2. Therefore, the Phase 2 investment is
12 aligned to be in-service just prior to the winter season when it is modeled to be *necessary*
13 *for system reliability*.

14 **Q. Has the Company put controls in place to mitigate the potential for**
15 **significant cost overruns or project delays on this project?**

16 A. Yes, the July 31, 2025 in-service date in the project schedule for Phase 2
17 includes allowances for delays due to inclement weather and unforeseen construction
18 conditions. Construction of Phase 2 is progressing steadily with the entire 14-mile pipeline
19 trenched, welded, and installed in the trench. The south portion of the pipeline has been
20 hydrotested. Hydrotesting of the north portion of the pipeline, backfilling, final tie-in, final
21 testing, and commissioning of the pipeline remains to be completed with over a month of
22 schedule contingency remaining to account for inclement weather and/or unforeseen
23 conditions.

1 **Q. Is Phase 2 still on track to meet the July 2025 in-service date?**

2 A. Yes. As noted above, since filing my rebuttal testimony, the entire pipeline
3 is now trenched and Phase 2 is on target to be in service by July 31, 2025.

4 **Q. Does this conclude your surrebuttal testimony?**

5 A. Yes, it does.

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.)

STATE OF MISSOURI)

CITY OF ST. LOUIS) ss

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

Sworn to me this 1st day of May, 2025.