

Exhibit No.:
Issue(s): Natural Gas Inventory
Witness: Jared Giacone
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

JARED GIACONE

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

CASE NO. GR-2024-0369

*Jefferson City, Missouri
May 2025*

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

2 **OF**

3 **JARED GIACONE**

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 Jared Giacone and my business address is 615 East 13th Street
9 Kansas City, MO 64106.

10 Q. Are you the same Jared Giacone that filed direct testimony in this case on
11 February 28, 2025?

12 A. Yes.

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

14 A. My true-up direct testimony addresses Staff's recommendation for the balance
15 of natural gas inventory within rate base as part of Staff's true-up audit.

16 Q. What is your recommendation for the level of natural gas inventory to include
17 in the cost of service as of the December 31, 2024, true-up date?

18 A. I recommend a 13-month average of natural gas inventory for the 13-month
19 period ending December 2024 to correspond with the December 31, 2024, true-up period.
20 I recommended a 13-month average of natural gas inventory ending June 30, 2024
21 (Staff's update period in this case) in direct testimony. Ameren Missouri also used a 13-month
22 average of natural gas inventory as of March 31, 2024 (the test year in this case).
23 Consistent with the direct testimony of Ameren Missouri witness Benjamin Hasse¹,

¹ Docket No. GR-2024-0369 direct testimony of Benjamin Hasse page 6 lines 3-8

Surrebuttal/True-Up Direct Testimony
of Jared Giacone

1 Staff anticipates Ameren Missouri will update natural gas inventory to the December 31, 2024,
2 true-up period using their same 13-month average methodology when their true-up direct
3 testimony is filed on May 2, 2025.

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

5 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)
Its Revenues for Natural Gas Service)

Case No. GR-2024-0369

AFFIDAVIT OF JARED GIACONE

STATE OF MISSOURI)
)
COUNTY OF Jackson) ss.

COMES NOW JARED GIACONE 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 Jared Giacone*; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.



JARED GIACONE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 25th day of April 2025.



Notary Public

