

FILED
December 3, 2025
Missouri Public
Service Commission

Exhibit No. 105

Staff – Exhibit 105
Testimony of Jordan T. Hull
Surrebuttal
Case No. ET-2025-0184

Exhibit No.:
Issue(s): *Large load Demand
Response Program*
Witness: *Jordan T. Hull*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *ET-2025-0184*
Date Testimony Prepared: *November 3, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

SURREBUTTAL TESTIMONY

OF

JORDAN T. HULL

**UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI**

CASE NO. ET-2025-0184

*Jefferson City, Missouri
November 2025*

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OF

JORDAN T. HULL

CASE NO. ET-2025-0184

Q. Please state your name and business address.

A. Jordan T. Hull, 200 Madison Street, Jefferson City, Missouri 65101.

Q. Please describe your educational background and work experience.

A. Please refer to the attached Schedule JTH-s1.

Q. Have you previously filed testimony before this Commission?

A. Yes. Please refer to the attached Schedule JTH-s1 for a list of cases in which

I have previously filed testimony.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony

of Renew Missouri witness Ms. Jessica Polk Sentell regarding her proposal for Union Electric

Company d/b/a Ameren Missouri (“Ameren Missouri”) to include a demand response program

within Ameren Missouri's large load tariff.

RESPONSE TO MS. SENTELL

Q. Please describe Ms. Sentell's rebuttal testimony regarding demand response.

A. Renew Missouri recommends on page 16 of Ms. Sentell's rebuttal testimony, in

this case, that Ameren Missouri consider a Large Load Demand Response Tariff.

Q. Did Ameren Missouri include a large load specific demand response program in

its new large load tariff filing?

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100.	100.

1 Q. Did Ms. Sentell include what the demand response large load tariff would look
2 like, what it would cost rate payers, what the curtailments would look like, or who would be
3 the participants?

4 A. No.

5 Q. What is Staff's recommendation on Ameren Missouri including a large load
6 demand response tariff?

7 A. Staff recommends that the Commission not approve a demand response program
8 at this time. Ameren Missouri did not include this proposed tariff in its filing and Staff is unsure
9 if Ameren Missouri plans to include large load tariff curtailments within its current MEEIA
10 business demand response program or create a new large load only demand response tariff at
11 some point in the future.

12 Staff recognizes the potential value of a properly designed demand curtailment program.
13 Such a program could help mitigate the incremental capacity and wholesale energy cost impacts
14 associated with large load customers. Staff encourages Ameren Missouri to continue engaging
15 with potential large load participants to develop a revised and reasonable large load demand
16 response program that could be brought forward in a future tariff filing.

17 Q. What are Staff's concerns with approving demand response large load tariffs in
18 this docket?

19 A. Staff's concerns primarily deal with not knowing the customers, the
20 participation levels, and curtailment capabilities. Staff also needs more details in order to
21 support the design of a program around these large load customers.

22 Q. What are some details that Staff would be interested in if parties were to design
23 a large load demand response tariff?

Surrebuttal Testimony of
Jordan T. Hull

1 A. The necessary details would encompass a performance penalty, exclusion of an
2 earnings opportunity, and the affordability for all rate payers. Staff would like to consider these
3 details when looking at demand response at a large load level of curtailment.

4 Q. Was a demand response program rider or tariff contemplated as part of
5 Senate Bill 4?

6 A. No, § 393.130.7 does not mention demand response.

7 Q. Does that conclude your Surrebuttal?

8 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)	
Union Electric Company d/b/a Ameren Missouri)	Case No. ET-2025-0184
for Approval of New Modified Tariffs for)	
Service to Large Load Customers)	

AFFIDAVIT OF JORDAN T. HULL

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW JORDAN T. HULL and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Jordan T. Hull*; and that the same is true and correct according to his best knowledge and belief.

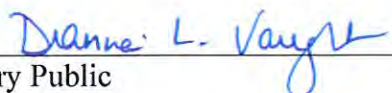
Further the Affiant sayeth not.



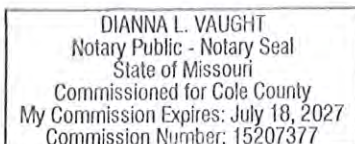
JORDAN T. HULL

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 28th day of October 2025.



Notary Public



Jordan T. Hull

CURRENT POSITION:

I am currently an Associate Engineer in the Energy Resources Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND & WORK EXPERIENCE:

I received my Bachelor of Science Degree in Biological Engineering from the University of Missouri-Columbia in May of 2016. In June of 2016 I began employment with the Missouri Department of Natural Resources in the Air Pollution Control Program as an Environmental Engineer I. In June of 2017, I was promoted to an Environmental Engineer II within the Air Pollution Control Program. I began employment with the commission in November of 2018.

Summary of Case Involvement:

Case Number	Utility	Type	Issues
EO-2019-0067	KCP&L GMO	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0068	KCP&L	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2019-0049	Liberty-Empire Electric Company	Integrated Resource Plan	Misc.
EO-2019-0132 & EO-2019-0133	KCP&L	MEEIA	Misc.
EO-2019-0257	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
ER-2019-0335	Ameren- Missouri	Rate Case	Heat Rates
ER-2019-0374	Liberty-Empire Electric Company	Rate Case	Heat Rates
EO-2020-0059	Liberty-Empire Electric Company	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization
EO-2020-0262	Eversource	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment.

cont'd Case Participation
Jordan T. Hull

Case Number	Utility	Type	Issues
EO-2020-0263	Evergy Metro	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rates, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0021	Ameren- Missouri	Integrated Resource Plan	Misc.
EO-2021-0281	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2021-0035	Evergy- Metro	Integrated Resource Plan	Misc.
EO-2021-0036	Evergy- West	Integrated Resource Plan	Misc.
EO-2021-0060	Ameren- Missouri	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
ER-2021-0240	Ameren- Missouri	Rate Case	Heat Rate
ER-2021-0312	Liberty- Empire	Rate Case	Heat Rate
EO-2021-0331	Liberty Empire	Integrated Resource Plan	Misc.
EA-2022-0099	Ameren- Missouri	CCN	Qualified to construct
EO-2022-0337	Ameren- Missouri	Rate case	Heat Rate
EO-2022-0245	Ameren- Missouri	CCN	Qualified to construct
EO-2023-0087	Liberty- Empire	FAC Prudency Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EA-2023-0017	Grain Belt Express LLC	CCN	Qualified to construct
EO-2023-0180	Ameren- Missouri	MEEIA Prudency Review	Demand Response
EO-2023-0407	Evergy-Metro	MEEIA Prudency Review	Demand Response
EO-2023-0408	Evergy-West	MEEIA Prudency Review	Demand Response
EO-2024-0020	Ameren-Missouri	Integrated Resource Plan	Misc.

cont'd Case Participation
Jordan T. Hull

Case Number	Utility	Type	Issues
EO-2024-0053	Ameren-Missouri	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2024-0153	Evergy-Metro	Integrated Resource Plan	Misc.
EO-2024-0154	Evergy-West	Integrated Resource Plan	Misc.
EO-2024-0241	Liberty-Empire	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0073	Evergy-Metro	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0074	Evergy-West	FAC Prudence Review	Heat Rate, Plant Outages, Generation Utilization, Self-Commitment
EO-2025-0169	Ameren-Missouri	MEEIA Prudence Review	Demand Response