

FILED
May 01, 2023
Data Center
Missouri Public
Service Commission

Exhibit No. 100C

Staff – Exhibit 100C
CONFIDENTIAL
Paul K. Amenthor
Direct Testimony
File No. ER-2022-0337

Exhibit No.:
Issue(s): Payroll and Payroll Taxes
Other Employee Benefits
Witness: Paul K. Amenthor
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: ER-2022-0337
Date Testimony Prepared: January 10, 2023

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS DIVISION

AUDITING DEPARTMENT

**DIRECT TESTIMONY
Revenue Requirement**

OF

PAUL K. AMENTHOR

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

CASE NO. ER-2022-0337

*Jefferson City, Missouri
January 2023*

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PAUL K. AMENTHOR

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

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1 A. Yes. I used the regulatory concepts that include the test year and true up periods
2 and annualizations and normalizations in my testimony. These concepts are defined in the
3 direct testimony of Staff witness Keith Majors.

4 **PAYROLL**

5 Q. How did Staff annualize Ameren Missouri's employee payroll?

6 A. Staff computed annualized payroll by adjusting the test year labor costs, as of
7 the twelve months ending March 31, 2022, in order to reflect union and management increases,
8 change in headcount of ongoing management and union employees and the overtime associated
9 with the Callaway nuclear refueling as of the update period, June 30, 2022.

10 Q. How did Staff calculate union and management wage increases?

11 A. Staff has computed an adjustment for the January 1, 2022 union and
12 management wage increase by applying at each payroll class their corresponding percentage,
13 which were ** [REDACTED] ** for union and management respectively. For purposes of
14 computing the wage increase, Staff removed all incentive compensation and bonus payments
15 from the test year payroll expense in order to isolate base payroll expense before applying the
16 wage increase. Staff witness Matthew R. Young addresses the incentive compensation issue.

17 Q. How did Staff account for the change in headcount for union and
18 management employees?

19 A. Staff included in its payroll calculation the change occurred in union and
20 management employee levels through June 30, 2022.

21 Q. What O&M ratio has Staff applied to Ameren Missouri's payroll?

22 A. Staff has applied to its payroll calculation the current O&M ratio for the
23 12 months ending June 30, 2022.

1 Q. How did Staff distribute the payroll's adjustment?

2 A. Staff's adjustment for payroll expense was distributed by account based on
3 Ameren Missouri's actual payroll distribution during the test year ending March 31, 2022. Staff
4 will reexamine payroll and any payroll related costs during its true up audit to determine
5 whether any further adjustments to the cost of service are necessary.

6 **PAYROLL TAXES**

7 Q. What types of taxes are included in the payroll taxes?

8 A. Federal Unemployment Tax Act ("FUTA"), State Unemployment Tax Act
9 ("SUTA") and Federal Insurance Contributions Act ("FICA") are the components of payroll
10 taxes.

11 Q. How did Staff compute the payroll taxes?

12 A. Staff applied the current tax rates for the FICA, SUTA and FUTA to Staff's
13 annualized payroll to determine the ongoing level of payroll taxes. Staff's payroll tax
14 adjustment reflects the level of employees that existed at June 30, 2022, the wage increases for
15 both union and management employees as well as the normalized overtime of Callaway nuclear
16 refueling. Staff will reexamine this issue as part of its true-up audit through December 31, 2022
17 to determine whether any adjustments are necessary.

18 **EMPLOYEE BENEFITS**

19 Q. What are the components of Ameren Missouri employee benefits?

20 A. Ameren Missouri offers medical, dental, and vision insurance, as well as a 401K
21 benefits to its employees. Ameren also offers a pension plan and other post-employment

Direct Testimony of
Paul K. Amenthor

1 employee benefits (“OPEBs”) to its employees. Staff witness Jared Giacone addresses pensions
2 and OPEBs in his direct testimony in this proceeding.

3 Q. How did Staff annualize employee benefits?

4 A. Staff annualized employee benefits based on the actual benefit in place during
5 the twelve months ending June 2022 of employees for each payroll class, union and
6 management. Staff will reexamine employee benefits costs through the December 31, 2022, as
7 part of its true-up audit.

8 Q. Does this conclude your direct testimony?

9 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 Electric Service) Case No. ER-2022-0337

AFFIDAVIT OF PAUL K. AMENTHOR

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

COMES NOW PAUL K. AMENTHOR and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Paul K. Amenthor*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Paul K. Amenthor
PAUL K. AMENTHOR

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the City of St. Louis, State of Missouri, at my office in St. Louis, on this 4th day of January 2023.

LISA M. FERGUSON
Notary Public - Notary Seat
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 23, 2024
Commission Number: 16631502

Lisa M. Ferguson
Notary Public

Paul K. Amenthor

EDUCATIONAL BACKGROUND AND EXPERIENCE

In December of 2016, I graduated from Southern Illinois University Edwardsville with a Bachelor of Science in Accounting. I have also earned a Bachelor of Science in Economic and Management with an emphasis in Accounting Sciences from the University of Lomé, Togo in June of 2007.

I commenced employment with the Missouri Public Service Commission as Utility Regulatory Auditor in September 2017. As a Utility Regulatory Auditor II, I am responsible in part, for assisting with the audit and examination of the books and records of utility companies operating within the State of Missouri and sponsoring testimony as an expert witness in Commission proceedings.

Prior to employment with the Commission, I worked with Walmart from June 2011 to August 2017, as an Inventory Management Associate. In this position, I was primarily responsible for ensuring the accuracy of on-hand inventory in the warehouse.

I also worked with Lee Enterprises (Lee Finance) from March 2017 to August 2017 as a Circulation Accounting Clerk. In this position, I was primarily responsible for processing customers' remittances, invoices, and accounts deposits. I also provided support for senior staff with each end of month closing.

Paul Amenthor

CASE PARTICIPATION

<u>Company Name</u>	<u>Case No.</u>	<u>Issues</u>
Ameren Missouri (Electric)	ER-2022-0337	Payroll & Related Payroll Taxes Employee Benefits.
Spire-Investor (Gas)	GR-2022-0179	Prepayments, Customer Deposits, Customer Advances, Rents and Leases Expense, Materials & Supplies, Plant In Service and Depreciation Reserve, Injuries & Damages, PSC Assessment, Insurance Expense, Line Locating Costs, Fuel Expense, Software and IT Costs, Capitalized O&M Depreciation, Natural Gas Inventory
Ameren Missouri (Electric)	ER-2021-0240	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses MEEIA Test Year Labor and Non- Labor Expenses Non-Labor Power Plant maintenance Severance costs Permanent Cleaning procedures Call Center Costs Cybersecurity, software OPEB, Pension & trackers , SERP Non-qualified expense External Audit fees
Ameren Missouri (Gas)	GR-2021-0241	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses Non-Labor Distribution maintenance Severance costs Permanent Cleaning procedures Call Center Costs Cybersecurity, software OPEB, Pension & trackers , SERP Non-qualified pension expense External Audit fees
Missouri American Water Company (Water)	WR-2020-0344	Leases (Rents and Transportation), Rate Case Expense, Telecommunication Expense

<u>Company Name</u>	<u>Case No.</u>	<u>Issues</u>
Ameren Missouri (Electric)	ER-2019-0335	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses MEEIA Test Year Labor and Non- Labor Expenses Callaway Refueling OT Labor and non-Labor Real & Property Taxes Non-Labor Power Plant maintenance Dues & Donations Miscellaneous Expenses Severance costs
Ameren Missouri (Electric)	EA-2019-0371	CCN Filing
Ameren Missouri (Gas)	GR-2019-0077	<p>Rate Base Items: Prepayments, customer advances, customer deposits, Plant in service, Accumulated Reserve, natural gas inventories, materials and supplies</p> <p>Revenues: Customer Growth/seasonality, Removal of GRT, PGA, Unbilled Revenue, Provision for Rate Refunds, and Other Revenues</p> <p>Expenses: Uncollectible Expense, Capitalized depreciation, Non Labor Distribution Maintenance, and Interest on Customer Deposits Filed Direct, Surrebuttal/True-Up</p>
Liberty Midstates Natural Gas (MNG)	GR-2018-0013	<p>Advertising, Miscellaneous expenses, Insurance expense, regulatory expense, Environmental expense, Dues and Donations</p> <p>Filed Direct, Surrebuttal/True-Up</p>