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Service Commission

# Exhibit No. 116

Staff – Exhibit 116  
Kim Cox  
Surrebuttal/True-Up Direct Testimony  
File No. ER-2022-0337

*Exhibit No.:*  
*Issue:* *Rate Switching,  
Customer Growth,  
Community Solar,  
MEEIA*  
*Witness:* *Kim Cox*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal/True-Up  
Testimony*  
*Case No.:* *ER-2022-0337*  
*Date Testimony Prepared:* *March 13, 2023*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**SURREBUTTAL/TRUE-UP DIRECT TESTIMONY**

**OF**

**KIM COX**

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

**CASE NO. ER-2022-0337**

*Jefferson City, Missouri  
March 2023*

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

2 **OF**

3 **KIM COX**

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

6 **CASE NO. ER-2022-0337**

7 Q. Please state your name and business address.

8 A. Kim Cox, 200 Madison Street, Jefferson City, Missouri 65101.

9 Q. Are you the same Kim Cox who filed direct Cost of Service (“COS”) and  
10 rebuttal testimony in this case?

11 A. Yes, I am.

12 **SURREBUTTAL TESTIMONY**

13 Q. What is the purpose of your surrebuttal testimony?

14 A. The purpose of my surrebuttal testimony is to respond to the rebuttal  
15 testimony filed in this case by Union Electric Company, d/b/a Ameren Missouri (“Ameren  
16 Missouri”) witness Nicholas Bowden, Ph.D., regarding the Community Solar Pilot Program  
17 and the Lighting Class Municipal Discount.

18 **COMMUNITY SOLAR**

19 Q. Ameren Missouri witness Dr. Bowden states in his rebuttal testimony<sup>1</sup> that Staff  
20 applied the wrong rate per block to calculate the Community Solar Pilot Program revenue. Does  
21 Staff agree?

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<sup>1</sup> Nicholas Bowden Ph.D., rebuttal testimony, page 21, lines 2-7.

1           A.     Yes. While correcting the error<sup>2</sup>, Staff also discovered that \$14.19<sup>3</sup> per block  
2 was applied when adjusting for the rate change annualization. Staff has applied the correct rate  
3 in its true-up adjustments.

4     **LIGHTING CLASS MUNICIPAL DISCOUNT**

5           Q.     Ameren Missouri witness Dr. Bowden also states that Staff made an error in its  
6 calculation of discounts received by the municipal lighting customers<sup>4</sup>. Does Staff agree that  
7 an error was made?

8           A.     Yes. Staff did not increase the lighting discounts. The discounts are 10% of the  
9 total bill, and the lighting tariff class rates increased. Therefore, the discounts needed to be  
10 increased when adjusting for the rate change annualization adjustment.

11          Q.     What is the impact of the increase to the discounts?

12          A.     The overall impact is (\$36,928).

13     **TRUE-UP DIRECT TESTIMONY**

14          Q.     What is the purpose of your true-up direct testimony in this proceeding?

15          A.     The purpose of my true-up direct testimony is to address customer growth, rate  
16 switching, community solar, and the Missouri Energy Efficiency Investment Act (“MEEIA”).

17          Q.     What is Staff’s true-up customer growth adjustment?

18          A.     As stated in my direct COS and rebuttal testimony, Staff reviewed and  
19 made necessary adjustments to the Residential (“RES”), Small General Service (“SGS”),  
20 Large General Service (“LGS”), and Small Primary Service (“SPS”) number of customer bills

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<sup>2</sup> Staff applied \$11.92 per block for the months of July 2021 through February 2022 instead of \$13.91.

<sup>3</sup> \$14.19 is the rate that was effective February 28, 2022. Staff has applied the \$11.92 rate that became effective June 16, 2022, for the rate change annualization in the true-up filing.

<sup>4</sup> Nicholas Bowden PhD, page 22, lines 14 and 15.

1 per month. Staff applied December 2022 customer counts to the 12 months ending June 2022  
2 for the RES, SGS, LGS and SPS.

3 Q. What is Staff's rate switching true-up adjustment?

4 A. In response to Staff's Data Request No. 0148, Staff accounted for two customers  
5 switching from SPS to SGS, and one customer switching from SGS to SPS.

6 Q. What is Staff's MEEIA true-up adjustment?

7 A. Staff witness, Dr. Hari Poudel provided total true-up kWh MEEIA adjustment  
8 for the RES, SGS, LGS and SPS rate classes<sup>5</sup>. Staff applied the true-up monthly MEEIA  
9 adjustment by using the same method it did in the direct COS filing in this case<sup>6</sup>.

10 Q. What is Staff's Community Solar true-up adjustment?

11 A. As stated in my direct COS and rebuttal testimony, Staff reviewed the subscribed  
12 Community Solar Bank through the December 31, 2022, true-up cut-off. Based on the  
13 information received from the Company in response to Staff's Data Request No. 0150, Staff  
14 made adjustments to the RES and SGS subscribed blocks.

15 **CONCLUSION**

16 Q. What are your recommended true-up rate revenue adjustments?

17 A. The Commission should base its awarded revenue requirement on Staff's rate  
18 revenue adjustments as provided below.

19  
20  
21 *continued on next page*

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<sup>5</sup> Dr. Hari Poudel discusses the MEEIA and the calculation of the MEEIA kWh adjustment in his true-up testimony.

<sup>6</sup> Cox, direct testimony, page 7, lines 6-9.

Surrebuttal/True-Up Direct Testimony of  
Kim Cox

1

Rate Class	Test Year Revenue	Update Period Adj.	Rate Switching and Large Customer	Weather & Days Adj.	MEEIA Adj.	Growth Adj.	Community Solar Annualization	Rate change annualization including rate change for	Low Income Charge	EDI ADJ.	Total MO Normalized Revenue
			Annualization	community solar							
Res 1M	\$ 1,288,439,439	\$ 36,766,652	\$ -	\$ (24,066,225)	\$ (8,936,618)	\$ 6,832,351	\$ 459,924	\$ 83,777,621	\$ (1,821,671)		\$ 1,381,451,474
SGS 2M	\$ 281,277,422	\$ 9,499,924	\$ 15,622	\$ (3,524,480)	\$ (2,291,334)	\$ 2,029,391	\$ 25,407	\$ 17,801,454	\$ (310,452)		\$ 304,522,952
LGS 3M	\$ 520,252,648	\$ 14,986,823	\$ 1,140	\$ (3,275,441)	\$ (6,061,761)	\$ 195,862		\$ 32,957,026	\$ (264,677)	(482,414)	\$ 558,309,206
SPS 4M	\$ 222,687,480	\$ 6,480,369	\$ (2,629,291)	\$ (1,559,752)	\$ (1,130,557)	\$ 1,195,064		\$ 13,864,282	\$ (16,464)	(179,990)	\$ 238,711,140
LPS 11M	\$ 190,174,326	\$ 4,244,098	\$ 1,677,473	\$ (785,375)	\$ (78,268)			\$ 11,678,119		(61,598)	\$ 206,848,776
Lighting 5m	\$ 35,346,814	\$ 874,654						\$ 2,074,994			\$ 38,296,461
Lighting 6m	\$ 881,596	\$ 17,243						\$ 65,733			\$ 964,572
Lighting 6m metered	\$ 1,810,487	\$ 12,866						\$ 134,746			\$ 1,958,100
MSD	\$ 75,516	\$ 1,649						\$ 4,398			\$ 81,564
Total	\$ 2,540,945,729	\$ 72,884,279	\$ (935,057)	\$ (33,211,274)	\$ (18,498,539)	\$ 10,252,669	\$ 485,331	\$ 162,358,373	\$ (2,413,264)	\$ (724,002)	\$ 2,731,144,245

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3

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

4

A. Yes.

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 KIM COX**

STATE OF MISSOURI        )  
  )  
COUNTY OF COLE         )        ss.

COMES NOW KIM COX and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal/True-Up Direct Testimony of Kim Cox*; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.

  
\_\_\_\_\_  
KIM COX

**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 8<sup>th</sup> day of March 2023.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
\_\_\_\_\_  
Notary Public