

Exhibit No. 132

Exhibit No.:
Issue(s): LPS Operating Revenues
Witness: Nancy L. Harris
Sponsoring Party: MoPSC Staff
Type of Exhibit: True-Up Direct Testimony
Case No.: ER-2022-0337
Date Testimony Prepared: March 13, 2023

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF AND RATE DESIGN DEPARTMENT

TRUE-UP DIRECT TESTIMONY

OF

NANCY L. HARRIS

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

CASE NO. ER-2022-0337

*Jefferson City, Missouri
March 2023*

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NANCY L. HARRIS
UNION ELECTRIC COMPANY,
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CASE NO. ER-2022-0337**

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1 **TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **NANCY L. HARRIS**

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. My name is Nancy L. Harris. My business address is 200 Madison Street,
9 P.O. Box 360, Jefferson City, MO 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”) as
12 an Auditor in the Tariff and Rate Design Department of the Industry Analysis Division. I have
13 held this position since June 3, 2019, when I began employment with the Commission.

14 Q. Are you the same Nancy Harris that filed Direct and Rebuttal Testimony in
15 this case?

16 A. Yes.

17 EXECUTIVE SUMMARY

18 Q. What is the purpose of your True-Up testimony?

19 A. The purpose of this testimony is to describe the Large Primary Service (LPS)
20 rate class MEEIA operating revenues adjustment. For True-Up adjustment, Staff applied
21 Missouri Energy Efficiency Investment Act (MEEIA) True-Up kWh to revenue calculations
22 for the rate class.

23 Q. What is Staff’s MEEIA true-up adjustment to the LPS rate class?

1 A. Staff witness, Dr. Hari Poudel, provided total true-up kWh MEEIA adjustment
2 for the LPS rate class¹. Staff applied the true-up monthly MEEIA adjustment by using the same
3 method used in the direct COS filing in this case².

4 CONCLUSION

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

6 A. The Commission should base its LPS awarded revenue requirement on Staff's
7 rate revenue adjustments as provided below.³

Total Normalized Revenue Itemized Adjustments								
Rate Class	Test Year	Update Period	Rate Switch & Customer Adj.	Weather & Days	ADJ for True Up MEEIA	Rate Change	EDI	Total Revenue
11M	\$ 190,174,326	\$ 4,244,098	\$ 1,677,473	\$ (785,375)	\$ (78,268)	\$ 11,678,119	\$ (61,598)	206,848,776

8
9 Q. Does this conclude your true-up direct testimony?

10 A. Yes it does.

¹ Dr. Hari Poudel discusses the MEEIA and the calculation of the MEEIA kWh adjustment in his true-up testimony.

² Harris, direct testimony, page 7, lines 1-4.

³ The 11M (LPS) rate class Revenue and adjustments are also part of total Revenue discussed in the surrebuttal testimony of Ms. Kim Cox.

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 NANCY L. HARRIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW NANCY L. HARRIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *True-Up Direct Testimony of Nancy L. Harris*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



NANCY L. HARRIS

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 8th day of March 2023.





Notary Public