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Weather Normalization Steven M Wills Union Electric Company Rebuttal Testimony ER-2008-0318 October 14, 2008

## MISSOURI PUBLIC SERVICE COMMISSION

Case No. ER-2008-0318

**REBUTTAL TESTIMONY** 

**OF** 

STEVEN M. WILLS

ON

**BEHALF OF** 

UNION ELECTRIC COMPANY d/b/a AmerenUE

> St. Louis, Missouri October, 2008

> > Ancien UE Exhibit No. 58
> >
> > Case No(s). FR-2008-0318
> >
> > Date 12-12-08 Rptr KF

I		REBUTTAL TESTIMONY
2		OF
3		STEVEN M. WILLS
4		CASE NO. ER-2008-0318
5	Q.	Please state your name and business address.
6	Α	My name is Steven M Wills My business address is One Ameren Plaza
7	1901 Chouteau Avenue, St Louis, Missouri 63103	
8	Q.	By whom and in what capacity are you employed?
9	Α	I am employed by Ameren Services Company as Managing Supervisor
10	Quantitative Analytics	
11	Q.	Are you the same Steven M. Wills who filed direct testimony in this case?
12	Α	Yes, I am
13	Q.	What is the purpose of your rebuttal testimony?
14	Α	The purpose of my rebuttal testimony is to comment on the Missouri Public
15	Service Commission Staff's ("Staff") weather normalization adjustment and provide m	
16	understanding of the agreed upon resolution of the differences between Union Electri	
17	Company d/l	o/a AmerenUE ("AmerenUE" or "Company") and Staff on this issue
18	Q.	Did Staff use substantially the same methodology as the Company to
19	weather nor	malize test year sales in their direct case?
20	Α	For most customer classes, yes The one exception was the Large Primary
21	Service Clas	s ("LPS") For this class, Staff chose in its direct case to bypass the class leve
22	analysis based on daily load research for a customer specific approach based on billing dat	
23	from the test year	

1	Q. Other than the LPS class, were there any differences between Staff's	
2	weather normalization adjustment and the Company's?	
3	A Yes There were two other notable differences	
4	Q. What was the first difference?	
5	A At the time the Company filed its case, some of the actual temperature data	
6	from the test year was still preliminary data. That means that it had not been through the	
7	thorough screening process that the National Climatic Data Center uses to verify and correct	
8	temperature readings By the time of Staff's direct filing, the finalized data was available	
9	and was subsequently used in Staff's analysis The Company agreed that it is appropriate to	
10	use this final data in the analysis for this case	
11	Q. What was the other difference you noted above?	
12	A The other difference surrounded the handling of the extra day in the test year	
13	that comes as a result of 2008 being a "leap year" In both the procedure for calculating the	
14	normal weather temperature series and the method chosen by Staff to perform the "days"	
15	adjustment," the handling of the leap day was different than the method adopted by the	
16	Company	
17	Q. Has this issue been worked out between the parties?	
18	A Yes The Company has agreed for purposes of this case to use Staff's normal	
19	weather series and days' adjustment Although the Company prefers the methodology it used	
20	in this case, it believes that Staff's method was not unreasonable	
21	Q. Now please discuss the issue over the LPS class in more detail.	
22	A The LPS class is made up of many of the Company's largest commercial and	
23	industrial accounts Staff chose to review each customer's test year bills individually to	

- determine if the customer was weather sensitive, and then performed a weather adjustment at
- 2 the customer level The Company followed a similar methodology to what it used for its
- 3 other classes, employing class level daily load research to evaluate the weather response of
- 4 the entire class as a whole, and make an adjustment based on that weather response function
- 5 Q. How have the two parties agreed to resolve this issue?
- A It is my understanding from conversations with Staff that they have agreed to
- 7 use the Company's methodology for the LPS class along with their actual weather and
- 8 treatment of leap day as discussed above
- 9 Q. Did any other parties address weather normalization in their direct
- 10 cases?
- 11 A No, they did not.
- Q. So are there any remaining issues to be resolved on the subject of weather
- 13 normalization?
- 14 A I am not aware of any remaining issues Subject to Staff's confirmation, I
- 15 consider the issue resolved
- 16 Q. Does this conclude your rebuttal testimony?
- 17 A Yes, it does

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric )  Company d/b/a AmerenUE for )				
Authority to File Tariffs Increasing ) Rates for Electric Service Provided ) Case No. ER-2008-0318				
To Customers in the Company's ) Case No. ER-2008-0318				
Missouri Service Area.				
AFFIDAVIT OF STEVEN M. WILLS				
STATE OF MISSOURI ) ) ss				
CITY OF ST. LOUIS )				
Steven M Wills, being first duly sworn on his oath, states				
1. My name is Steven M. Wills I am employed by Ameren Services				
Company as Managing Supervisor, Quantitative Analytics in the Corporate Planning				
department				
2 Attached hereto and made a part hereof for all purposes is my Rebuttal				
Testimony on behalf of Union Electric Company, d/b/a AmerenUE, consisting of 3				
pages, all of which have been prepared in written form for introduction into evidence in				
the above-referenced docket.				
3. I hereby swear and affirm that my answers contained in the attached				
testimony to the questions therein propounded are true and correct				
Steven M. Wills				
Subscribed and sworn to before me this 10+k day of October, 2008.				
Umanda Tesdall Notary Public				
My commission expires				
Amanda Teadall - Notary Public Notary Seal, State of Missouri - St. Louis County Commission #07158967 My Commission Expires 7/29/2011				