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Witness: Kim Cox
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Date Testimony Prepared: June 7, 2019

MISSOURI PUBLIC SERVICE COMMISSION
COMMISSION STAFF DIVISION
OPERATIONAL ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

KIM COX

Staff Exhibit No. 111
Date 8-15-19 Reporter COX
File No. GR-2019-0077

UNION ELECTRIC COMPANY,
d/b/a AMEREN MISSOURI

CASE NO. GR-2019-0077

Jefferson City, Missouri
June 2019



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REBUTTAL TESTIMONY

OF

KIM COX

UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

CASE NO. GR-2019-0077

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1
2 **RESPONSE TO AMEREN MISSOURI'S PROPOSED SERVICE LINE EXTENSION**
3 **AND RELOCATION**

4 Q. What is Ameren Missouri's current distinction of service line and
5 extension costs?

6 A. Currently, the Company bases the extension cost on customer type of
7 Residential versus non-Residential customers.

8 Q. Is Ameren Missouri proposing to change the distinction?

9 A. Yes. Ameren Missouri is proposing to change the distinction based on the size
10 of the pipe being installed or relocated. Customer contributions for service line extensions and
11 relocations would be a service line less than 2" or a service line 2" and greater.

12 Q. Does Ameren Missouri propose any other changes?

13 A. Yes. Currently Ameren Missouri's service pipe charge for all customer types is
14 \$260 per connection plus \$4.30 per foot for all footage in excess of sixty feet. Ameren Missouri
15 proposes to continue the connection charge of \$260 with an increase to \$6.00 for all footage in
16 excess of sixty feet for service lines less than 2". For those greater than 2", Ameren Missouri
17 proposes to apply a 3 year projected revenue to be received from the customer and apply it
18 against the total cost of the service extension. Any service extension cost above the projected
19 3 year revenue will be billed to the customer upon completion of the installation.

20 Q. Does Staff have any concerns with the proposed changes?

21 A. Yes. Although, Staff does not oppose the new distinction or the 3 year projected
22 revenue toward the cost of the service extension however; Staff does propose additional
23 language be added to Tariff Sheet No. 19. Section A. and B. Staff proposes to add
24 "All customer payments received under this section will be applied as an offset to rate base."

1
2 **RESPONSE TO AMEREN MISSOURI'S PROPOSED DAILY USAGE**
3 **INFORMATION CHARGE FOR TRANSPORTATION CUSTOMERS**
4

5 Q. What is the proposed tariff language for the daily usage information charge?

6 A. Ameren Missouri's proposed tariff language is:

7 H. Daily Usage Information Charge

8 Applicable to Customers who enter into contracts with
9 the Company for transportation service to be provided
10 under the Company's Natural Gas Transportation
11 Service tariff:

12 In order to facilitate remote interrogation of
13 interval metering by the Company and provide daily
14 usage information to Customer, the Company will
15 install a remote monitoring device at each meter
16 location where Customer receives Transportation
17 Service. For each remote monitoring device, the
18 Customer, at Customer's expense, shall provide access
19 to a commercial telephone line and 120 volt AC
20 electric power at a location designated by the
21 Company. The telephone line shall be dedicated for
22 Company's use. If a Customer does not provide access
23 to a commercial telephone line and 120 volt AC
24 electric power at a location designated by the
25 Company, or, if interrogation is not possible due to
26 a telephone service outage, Company will dispatch
27 technicians each month with specialized equipment to
28 capture the daily usage information necessary to bill
29 Customer.

30 The charge to the Customer will be \$170.00 for each
31 occurrence.

32 If phone line is installed and Company is unable to
33 retrieve daily usage information it will be the
34 Customer's responsibility to verify that the
35 Customer's phone line is in working condition. In
36 addition, Company reserves the right to charge
37 Customers for each service call to investigate the
38 remote monitoring device if such service call is the
39 sole result of telephone service outage.
40

Rebuttal Testimony of
Kim Cox

1 Q. Is the daily usage information charge a new charge proposed by Ameren Missouri?

2 A. Yes, it is a new charge. Therefore, Staff recommends that Ameren Missouri track each
3 occurrence of the \$170 charge by customer and customer class. Staff also recommends the
4 daily usage information be retained and made available to Staff for review.

5 Q. Does this conclude your rebuttal testimony?

6 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 Increase)
its Revenues for Natural Gas Service) Case No. GR-2019-0077

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 *Rebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

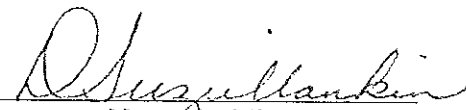
Further the Affiant sayeth not.


_____)
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 5th day of June 2019.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


_____)
Notary Public