

Exhibit No. 246

Commission Staff – Exhibit 246
Charles T. Poston
Direct Testimony (Gas)
File Nos. ER-2021-0240 & GR-2021-0241

Exhibit No.:
Issue(s): *Rate Design*
Class Cost of Service
Witness: *Charles T. Poston, PE*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Direct Testimony*
Case No.: *GR-2021-0241*
Date Testimony Prepared: *September 14, 2021*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

DIRECT TESTIMONY

OF

CHARLES T. POSTON, PE

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

CASE NO. GR-2021-0241

Jefferson City, Missouri
September 14, 2021

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OF
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1 **DIRECT TESTIMONY**

2 **OF**

3 **CHARLES T. POSTON**

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

6 **CASE NO. GR-2021-0241**

7 Q. Please state your name and business address.

8 A. My name is Charles T. Poston and my business address is 200 Madison Street,
9 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 a Senior Professional Engineer.

13 Q. Please describe your education background, work experience, and any cases in
14 which you have previously filed testimony before this Commission.

15 A. My credentials and a listing of cases in which I have previously filed testimony
16 are attached to Staff's Class Cost of Service Report ("CCOS Report") in Appendix 1.

17 **EXECUTIVE SUMMARY**

18 Q. What is the purpose of your direct testimony?

19 A. The purpose of this testimony is to sponsor Staff's recommended rate design as
20 developed by Staff and described in the CCOS Report filed at the same time as this direct
21 testimony.

22 **CCOS REPORT**

23 Q. What is Staff's rate design recommendation for gas service in this case?

Direct Testimony of
Charles T. Poston

1 A. Staff's rate design recommendations are as follows:

2 1. For the Residential class, allocate the increase to each non-gas rate element
3 by an equal percent.

4 2. For the Large Volume, Standard Transportation, General Service, and
5 Interruptible classes, Staff recommends the rate increase for each class be
6 allocated to each non-gas rate element by an equal percent. The volumetric
7 rate for these classes includes a two-block design, with usage for the first
8 7,000 Ccf consumed per month billed at a higher rate than the remaining
9 Ccf.

10 Staff also recommends that if the overall increase in the revenue requirement is different
11 from Staff's direct filed revenue requirement, the relationship of first block and second
12 block rates among the non-residential rate classes is maintained.

13 Q. What is Staff's recommended rate structure for each class?

14 A. Staff's recommended rate structure is as follows:

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Rate Classes	Current Rates	Proposed Rates
RESIDENTIAL		
Customer Charge	\$ 15.00	\$ 15.76
1st Block	\$ 0.31360	\$ 0.32950
2nd Block	\$ 0.31360	\$ 0.32950
Total Revenue	\$ 45,079,797	\$ 47,364,653
GENERAL SERVICE		
Customer charge	\$ 28.44	\$ 29.89
First Block	\$ 0.30480	\$ 0.32030
Second Block	\$ 0.19960	\$ 0.20970
Total Revenue	\$ 15,585,762	\$ 16,378,809
STANDARD TRANSPORT SERVICE		
Customer charge	\$ 28.34	\$ 29.78
Admin Charge (monthly)	\$ 42.87	\$ 45.05
Meter Equip Chg. (monthly)	\$ 21.00	\$ 22.07
School Agg and Bal	\$ 0.0044	\$ 0.0046
First 7000 Ccf	\$ 0.3048	\$ 0.3203
2nd Block	\$ 0.1702	\$ 0.1788
Total Revenue	\$ 9,341,226	\$ 9,814,844
LARGE TRANSPORT SERVICE		
Customer charge	\$ 1,432.11	\$ 1,504.88
Admin Charge (monthly)	\$ 42.87	\$ 45.05
First 7000 Ccf	\$ 0.3048	\$ 0.3203
2nd Block	\$ 0.1464	\$ 0.1538
Total Revenue	\$ 5,064,541	\$ 5,320,814
INTERRUPTIBLE SERVICE		
Customer charge	\$ 264.30	\$ 277.73
First 7000 Ccf	\$ 0.3048	\$ 0.3203
2nd Block	\$ 0.1639	\$ 0.1722
Total Revenue	\$ 395,297	\$ 415,339

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Charles T. Poston

1 Q. Does Staff have any other recommendations in its CCOS report?

2 A. Yes. Staff recommends changes to the tariff language concerning Ameren
3 Missouri's Special Contract Rates contained in Tariff Sheet No. 18.1. Staff also recommends
4 changes to the tariff language for Ameren Missouri's Delivery Charge Adjustment ("DCA") in
5 Tariff Sheet No. 31.1.

6 Q. What witnesses were responsible for the content of Staff's CCOS report?

7 A. Robin Kliethermes is the Staff witness for the majority of the content of the
8 CCOS Report. Staff witnesses Charles Poston and Michael Stahlman contributed to the sections
9 concerning the allocation of distribution costs and special tariffs, respectively.

10 Q. Does this conclude your direct testimony?

11 A. Yes it does.