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Exhibit No. 115

Staff – Exhibit 115
Kim Cox
Rebuttal Testimony
File No. ER-2022-0337

Exhibit No.:
Issue: *Customer Growth
and Community Solar*
Witness: *Kim Cox*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2022-0337*
Date Testimony Prepared: *February 15, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

KIM COX

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

CASE NO. ER-2022-0337

*Jefferson City, Missouri
February 2023*

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1 **REBUTTAL TESTIMONY OF**

2 **KIM COX**

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

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

6 Q. Please state your name and business address.

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

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

9 A. I am employed by the Missouri Public Service Commission (“Commission”) as
10 a Policy Analyst in the Tariff and Rate Design Department of the Industry Analysis Division
11 of the Commission Staff.

12 Q. Have you previously filed testimony in this case?

13 A. Yes. I provided testimony in the Cost of Service (COS) direct filing.

14 Q. What is the purpose of your rebuttal testimony?

15 A. The purpose of my rebuttal testimony is to respond to Union Electric Company
16 d/b/a Ameren Missouri’s (“Ameren Missouri”) witness Nicholas Bowden’s testimony
17 regarding Ameren Missouri’s growth adjustment for the residential (“RES”), small general
18 service (“SGS”), large general service (“LGS”), and small primary service (“SPS”) rate classes;
19 the community solar adjustment for the RES and SGS classes; and the review of Ameren
20 Missouri’s workpaper¹.

21 **RESPONSE TO AMEREN MISSOURI REGARDING THE CUSTOMER GROWTH**
22 **ADJUSTMENT**

23 Q. Did Ameren Missouri adjust billing units for customer growth?

¹ Workpaper, ER-2022-0337 Billing Unit Workpaper_CONF

1 A. Yes. Ameren Missouri forecasted customer growth by using monthly customer
2 counts from January 2013 through the test year, March 2022.

3 Q. Does Staff recommend using Ameren Missouri's growth adjustment?

4 A. No, for two reasons: 1. Staff generally does not recommend using forecasted
5 values for purposes of determining retail rate revenues and subsequent retail rates. 2. Staff
6 does not recommend using the customer counts Ameren Missouri used for forecasting and
7 applying the customer growth adjustment.

8 Q. What customer counts did Ameren Missouri use to determine the RES
9 December 31, 2022 forecast?

10 A. The monthly customer counts Ameren Missouri used to forecast the customer
11 growth for December 31, 2022, were different than the monthly customer counts Ameren
12 Missouri used to apply the growth adjustment². The table below shows the difference between
13 the two sets of customer counts the Company used to calculate their customer growth
14 adjustment.

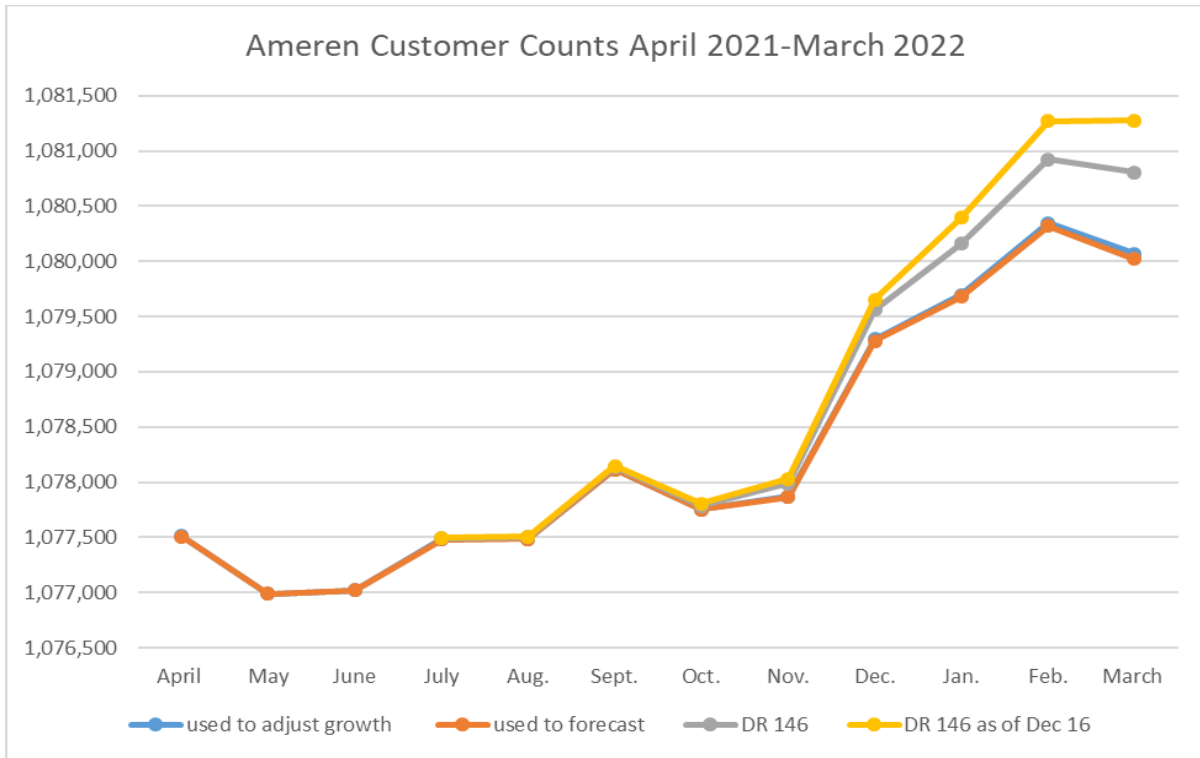
YearMonth	Customer counts used to apply customer growth	Customer counts used to forecast	Delta
202104	1,077,510	1,077,509	1
202105	1,076,989	1,076,987	2
202106	1,077,023	1,077,022	1
202107	1,077,483	1,077,482	1
202108	1,077,487	1,077,486	1
202109	1,078,115	1,078,114	1
202110	1,077,754	1,077,751	3
202111	1,077,870	1,077,864	6
202112	1,079,294	1,079,280	14
202201	1,079,695	1,079,678	17
202202	1,080,348	1,080,321	27
202203	1,080,071	1,080,020	51

15

²The customer counts can be different depending on when the report is ran.

1 Q. Besides the customer counts in the above table, did Ameren Missouri provide
2 additional data sets that differ from the data used in the Company's direct customer growth
3 adjustment³?

4 A. Yes, for the months of the test year, Ameren Missouri provided two additional
5 data sets in their response to Data Request 0146⁴ and the update to Data Request 0146⁵. The
6 change in counts among the various data sets is illustrated in the chart below, which includes
7 noticeable differences starting in November 2022.



10 By not being able to include these updated customer counts in the forecast, Ameren
11 Missouri's analysis resulted in a lower customer count that was applied to billing units. Ameren
12 Missouri applied a monthly residential customer count of 1,084,021 to determine the

³ Workpaper ER-2022-0337 Billing Unit Workpaper_CONF

⁴ Data Request 0146 requested 12 months ending June 2022.

⁵ Mspc 0146s2 billing unit workpaper update period input data review.

1 customer growth rate. If Ameren Missouri was able to incorporate the updated counts in
2 Data Request 0146, the growth rate would have been higher.

3 Q. What is Staff's direct recommended customer growth adjustment?

4 A. Staff's direct recommended customer growth adjustment is \$4,193,054. Staff
5 used the monthly customer counts that were provided by Ameren Missouri in Data
6 Request 0146. Given time restraints, Staff was not able to utilize the customer counts in the
7 update to Data Request 0146. As stated in my COS direct testimony⁶, Staff will review
8 customer growth through the December 31, 2022, true-up cut off and make adjustments as
9 necessary to reflect the change in customer levels.

10 **RESPONSE TO AMEREN MISSOURI COMMUNITY SOLAR ADJUSTMENT FOR**
11 **THE RES AND SGS CLASSES**

12 Q. What is the community solar adjustment?

13 A. The community solar adjustment accounts for revenues collected for the
14 Community Solar Pilot Program. If available, a customer can subscribe to a solar block that is
15 equivalent to 100 kWh. The customers' billed kWh is reduced by the applicable solar blocks
16 subscribed to, and in return, the customer is billed the solar block charge⁷.

17 Q. What community solar adjustment did Ameren Missouri make?

18 A. Ameren Missouri made an adjustment for the revenue that was collected during
19 the test year⁸.

20 Q. Does Staff agree with the Company's adjustment?

21 A. Staff agrees with the revenue adjustment for actual revenues collected.

⁶ Cox direct testimony, page 9, lines 18 and 19.

⁷ Data Request 0146 or the update to Data Request 0146.
charge and the facilities charge.

⁸ 12 months ending March 2022.

1 However, Staff does not agree with not making an annualization adjustment for the additional
2 solar facility that was in service as of March 22, 2022⁹. In Ameren Missouri's direct filing,
3 they did not make an annualization adjustment nor did they state they would in the true-up direct
4 filing on March 13, 2023.

5 Q. What is Staff's direct recommended community solar adjustment?

6 A. Staff's direct recommended community solar revenue adjustment is \$332,775.

7 Staff accounted for the additional solar facility by applying the difference of the actual and
8 the minimum subscribed blocks and kWh to the 12 months ending June 2022. Staff applied
9 the kWh reduction to the developed percent in each applicable season and block and
10 multiplied the appropriate rates to calculate the normalized and annualized usage. As stated in
11 my COS direct testimony¹⁰, Staff will review the subscribed community solar through
12 December 31, 2022, true-up cut-off, and make adjustments as necessary to reflect the change
13 in the subscribed solar blocks and kWh usage.

14 **REVIEW OF AMEREN MISSOURI'S WORKPAPER**

15 Q. In Staff's review of the Company's workpapers, were there any concerns?

16 A. Yes. Staff talked to the Company and was advised that the issues would be
17 addressed in their true-up version workpaper.

18 Q. Does this conclude your rebuttal testimony?

19 A. Yes.

⁹ The new facility did not come on until the last month of the test year; therefore, Ameren Missouri was not able to account for it.

¹⁰ Cox direct testimony, page 11, lines 1-3.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

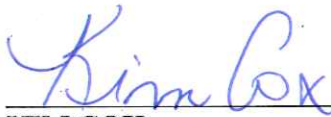
In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust)
Its Revenues for Electric Service) Case No. ER-2022-0337

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

Further the Affiant sayeth not.

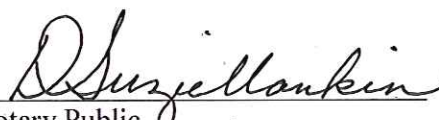


KIM COX

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 10th day of February 2023.





Notary Public