

Exhibit No. 162

Exhibit No.:
Issue(s): *Blocks*
Witness: *Michael L. Stahlman*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *True-Up Rebuttal Testimony*
Case No.: *ER-2022-0337*
Date Testimony Prepared: *March 24, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

TRUE-UP REBUTTAL TESTIMONY

OF

MICHAEL L. STAHLMAN

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

CASE NO. ER-2022-0337

Jefferson City, Missouri
March 2023

1 **TRUE-UP REBUTTAL TESTIMONY OF**

2 **MICHAEL L. STAHLMAN**

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. My name is Michael L. Stahlman, and my business address is Missouri Public
8 Service Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

9 Q. Are you the same Michael L. Stahlman that filed direct, rebuttal, and surrebuttal
10 testimony in this docket?

11 A. Yes.

12 Q. What is the purpose of your true-up rebuttal testimony?

13 A. My true-up rebuttal testimony is to address that Dr. Bowden inappropriately
14 changed the methods of estimating the Residential Winter Block 1 kWh and Small General
15 Service (“SGS”) Base kWh.

16 Q. Did Dr. Bowden provide true-up workpapers in this case?

17 A. Yes. Dr. Bowden provided the excel document entitled, “Bowden SR WRKPR
18 - Billing Unit Workpaper True-Up CONF.xlsx”.

19 Q. Did Dr. Bowden include an additional method for determining Residential
20 Winter Block 1 kWh and Small General Service (“SGS”) Base kWh that was not previously
21 provided in prior testimony?

22 A. Yes. On the “Residential” tab, for the months of March and April 2022¹, he
23 utilized a third method for estimating these block percentages. In all previous testimony, he

¹ Cell numbers K332 and L332.

1 only used two. In a similar fashion, he also changed the method for estimating “Base kWh” on
2 the “SGS” tab for November 2021².

3 Q. What are the two methods he used prior to true-up?

4 A. As discussed in my rebuttal testimony, Mr. Bowden either used one of several
5 monthly-specific regression models³ or leaves the value unadjusted.⁴

6 Q. What method was introduced in true-up?

7 A. For Residential, his third method is to leave Winter Block 2 kWh unadjusted,
8 then make Winter Block 1 kWh equal total kWh less Winter Block 2 kWh and Summer kWh.⁵
9 For SGS, he kept the “Seasonal kWh” unadjusted and adjusted the “Base kWh” off of that
10 change.⁶

11 Q. Is it appropriate to change methods for calculating Winter Block 1 kWh in
12 true-up?

13 A. No. Per the Commission’s “Order Setting Procedural Schedule and Adopting
14 Test Year”, “No party shall revise or change that party’s method or methodologies for true-up
15 issues” (page 3, footnote 6).

16 Q. Does this conclude your testimony?

17 A. Yes it does.

² Cell G256

³ Rebuttal Testimony of Michael L. Stahlman, p.1, ll. 21-22.

⁴ Rebuttal Testimony of Michael L. Stahlman, p.2, ll. 4-6.

⁵ Winter Block 1 kWh = total kWh – (Winter Block 2 kWh + Summer kWh)

⁶ It should also be noted for SGS that the applied method changed for specific months, e.g. February 2022 was previously based on his specific monthly regression analysis and in true-up, the “base kWh” is unadjusted. Interestingly, November 2021 was previously unadjusted and in true-up has the new method discussed above.

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) Case No. ER-2022-0337
Its Revenues for Electric Service)

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL L. STAHLMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *True-Up Rebuttal Testimony of Michael L. Stahlman*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

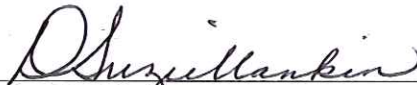


MICHAEL L. STAHLMAN

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 27th day of March 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public