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Mitchell Lansford
True-Up Rebuttal Testimony
File No. ER-2022-0337

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File No.:	ER-2022-0337
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2022-0337

TRUE-UP REBUTTAL TESTIMONY

OF

MITCHELL LANSFORD

ON

BEHALF OF

UNION ELECTRIC COMPANY

d/b/a Ameren Missouri

St. Louis, Missouri
March, 2023

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TRUE-UP REBUTTAL TESTIMONY

OF

MITCHELL LANSFORD

FILE NO. ER-2022-0337

Q. Please state your name and business address.

A. Mitchell Lansford, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. Are you the same Mitchell Lansford that filed direct, rebuttal, surrebuttal and true-up direct testimony in this proceeding?

A. Yes, I am.

I. <u>PURPOSE OF TESTIMONY</u>

Q. What is the purpose of your true-up rebuttal testimony in this proceeding?

A. This testimony includes the correction of errors and other updates to the Company's true-up direct revenue requirement and the Company's rebuttal to Staff's true-up direct testimony regarding employee benefit costs and transmission expenses.

Q. Do you have any schedules supporting your true-up rebuttal testimony?

A. Yes. I am sponsoring Schedules MJL-TUR1 through MJL-TUR17 relating to the Company's revenue requirement and net base energy costs ("NBEC"). These schedules are the same as Schedules MJL-S1 through MJL-S17 included with my surrebuttal and true-up direct testimony, except for updates to NBEC and adjustments for certain software costs and revenues that will be described later in this testimony. Additionally, I am supporting Schedules MJL-TUR18 through MJL-TUR20 relating to transmission expenses associated with Midcontinent Independent System Operator ("MISO") Schedules 26-A and 9.

II. NET BASE ENERGY COSTS

Q. Has the Company identified any errors in its NBEC filed in its true-up direct testimony?

A. Yes. The Company identified two errors in its calculations related to planned outage assumptions used in its production cost model. The Company has corrected these items and provides Schedules MJL-TUR1 to MJL-TUR17 to detail the effects of these corrections on its revenue requirement and NBEC. Correction of these errors resulted in an increase to the Company's revenue requirement and NBEC of $13,673,466. The Company informed Staff of these errors and the intention to correct these errors as soon as they became known.

III. SOFTWARE IVESTMENT AND RENTAL

Q. In the Company's revised revenue requirement schedules, have there been any changes related to software investments and rentals?

A. Yes. The Company noticed differences between the Company's and Staff's positions related to the Company's investment in its general ledger software. The Company owns this software and leases it to other Ameren affiliates, while receiving rental revenues in exchange.

Q. Please explain these changes.

A. After conferring with Staff, the Company intends to align with Staff and has added back the plant costs, reserve for accumulated depreciation, amortization, revenues, and accumulated deferred income taxes associated with this investment to its revenue requirement. The related amounts are those that occurred during 2022 or existed as of December 31, 2022, as applicable. Schedules MJL-TUR1 through MJL-TUR17 provide the results of this change and the correction of the errors in NBEC previously mentioned on the Company's revenue requirement.

Q. What is the Company's revised revenue deficiency after addressing the two just-discussed issues?

A. After making the just-discussed changes, the Company's revenue requirement is $238,974,000 more than retail operating revenues at present rates.

IV. OTHER ITEMS

Q. Has the Company identified errors or miscalculations in Staff's true-up revenue requirement or supporting workpapers?

A. Yes. The Company has conferred with Staff and understands that Staff intends to correct certain errors or miscalculations in its true-up rebuttal testimony.[1]

V. EMPLOYEE BENEFIT COSTS

Q. Please describe the Company's adjustments to employee benefit costs?

A. In the Company's true-up direct testimony, it updated employee benefit costs to the level of annual costs for employee levels (headcount) that existed on December 31, 2022 (the true-up date in this case). The Company updated this item by first comparing employee benefit costs from the test year to the applicable cost levels incurred during the twelve-months ended December 31, 2022, and this resulted in an increase to the Company's revenue requirement of $855,417 (step one).[2] At this point in the calculation process, 2022 employee benefit costs reflect approximately no cost for an employee hired on December 31, 2022, one month's worth of costs for an employee hired on November 30, 2022, and so on. In order to annualize the benefit costs associated with changes in employment levels that occurred during 2022, and ultimately reflect an annual level of

[1] I am not rebutting the revenue requirement impact of these errors based on Staff's indication to me that it is fixing each of these errors and that those corrections to its revenue requirement will be reflected in its true-up rebuttal testimony. However, if the Staff does not follow-through and correct each error the Company should be afforded an opportunity to address them.
[2] An increase as compared to test year levels.

benefit costs for the actual employment levels that existed at the true-up date, a second step is necessary. For that second step, the Company compared the average employee levels from 2022 (that determined the cost levels from 2022 that I just referred to) to the employee levels that existed on December 31, 2022, and multiplied that difference by the average benefit cost per employee. Again, this second step ensures that the benefit costs of an employee hired on December 31, 2022, are included in the Company's revenue requirement and this second step further increased the Company's revenue requirement by $625,454. The best measure of the Company's ongoing employee benefit costs is an amount that is based on the employment levels that existed as of the true-up date. The Company has utilized this same method in many of its past cases and I am not aware of Staff having criticized this approach in any of those past cases.

Q. Please describe Staff's adjustments to employee benefit costs?

A. Underlying Staff's true-up direct testimony and as reflected in its related revenue requirement, Staff compared employee benefit costs from the test year to the applicable cost levels incurred during the twelve-months ended December 31, 2022. Staff adjusted its revenue requirement for the difference (step one as referred to above). However, no further adjustment for employment levels that existed at December 31, 2022, was made by Staff in its true-up direct case. After filing true-up direct testimony, Staff and the Company conferred, and Staff provided updated workpapers that I understand it intends to use to reflect as an adjustment in its true-up rebuttal testimony. Through correspondence, Staff indicated it intended to reflect additional benefit costs in its revenue requirement for the employment levels that existed at December 31, 2022. However, the workpaper Staff provided reflects the Staff's calculation of step one above multiplied by 25 percent.[3]

Q. Why has Staff multiplied its adjustment from step one above by 25 percent?

A. I don't know. I believe this may have been an attempt to normalize the portion of the test year that overlaps the twelve-months ended December 31, 2022. Twenty-five percent of the twelve months ended December 31, 2022, overlaps with the test year. However, there is no logical reason for making such an adjustment. If Staff's revised adjustment was meant to annualize benefit costs for employment levels that exist at the true-up date, the adjustment does not rely on those employment levels at all and therefore fails to achieve that goal. Instead, Staff is merely adding twenty-five percent of its adjustment that I'm describing as step one above to its revenue requirement. Simply put, any employee that the Company hired on December 31, 2022, has no associated employee benefit cost included in Staff's true-up revenue requirement. The same is true that 100% of the benefit costs of employees who were hired throughout 2022 are not included in Staff's revenue requirement, either as filed in Staff's true-up direct testimony or as I expect Staff to file in its true-up rebuttal testimony. Perhaps through some illogical means, Staff intends to reflect 25 percent of these costs in a revised revenue requirement, but the only way to accurately reflect employee benefit costs in the revenue requirement is to annualize those benefits by applying them to the headcount as of December 31, 2022.

[3] For clarity, my understanding of Staff's intention is to continue to include its adjustment that I'm referring to as step one and to include an additional adjustment that is equal to twenty-five percent of that same step one adjustment.

Q. Please summarize your response to Staff's adjustments to employee benefit costs.

A. Staff's adjustments in its true-up direct testimony and what the Company understands Staff intends to include in its true-up rebuttal testimony, will not reflect the Company's full cost of providing employee benefits to its employees, whereas the Company's adjustments appropriately include the annualized employee benefits costs at the true-up date in this case. The Commission should reject Staff's adjustments in favor of those provided by the Company.

VI. TRANSMISSION EXPENSES

Q. What dispute does the Company have with Staff regarding transmission expenses associated with MISO Schedule 9 and Schedule 26-A?

A. Staff's true-up revenue requirement omits known and measurable increases in MISO charges to the Company assessed under MISO Schedule 26-A and Schedule 9 for transmission service taken under MISO's FERC-approved tariff associated with serving the Company's load. Both Schedules 9 and 26-A have new associated rates that became effective January 1, 2023. While the Company has included these known and measurable cost increases in its revenue requirement, Staff has ignored them.

Q. How have these items been treated in prior cases?

A. In File No. ER-2016-0179 both the Company and the Staff agreed that the known and measurable increase in Schedule 26-A expenses that was effective January 1, 2017 (the true-up date in that case was similarly December 31, 2016) should be included in the Company's revenue requirement used to set rates in that case.[4] Below is an image of Staff's workpaper for Schedule 26-A costs in File No. ER-2016-0179:[5]

11	Schedule		Staff Annualized Amount
46	MISO TRANSMISSION EXPENSES:		
49			
50	1	Scheduling, System Control, and Dispatch	($174,952)
51	2	Reactive Supply and Voltage Control	($401,624)
52	7 & 8	Basic Transmission Revenue	($7)
57	26	Network Upgrade Charge From MTEP	($9,801,261)
58	26A	ARR Pass-Through Associated with MVPs 3/	$284,243
59	26A	MVP Charges (was previously included in 26, split began in Jan 2012)	($33,594,820)
60	26A	Increase for 2017 - 19.07% overall MISO increase (See DR 458HC Tab)	($7,353,118)
61	33	Blackstart Service	($9,514)
62	45	Cost Recovery of NERC Recommendation or Essential Action	$0
63		**Total**	
64			
65		**Entergy Related Charges**	
66	1	Scheduling, System Control, and Dispatch	($24,494)
67	2	Reactive Supply and Voltage Control	($93,100)
68	9	Schedule 9	($1,586,582)
69	11	Wholesale Distribution Charges	($95,976)
70	41	Storm Securitization Charge	($21,929)
71	42A	Accrued and Paid Interest	($31,679)
72	42B	Credit Associated with AFUDC	$4,991
73	47	MISO Transition Cost Recovery	$0
74		**Total Entergy Charges**	
75			
76	TOTAL MISO EXPENSES		
77			
78	Non-MISO 565 Expenses (Transmission By Others)		($996,276)
79			
80		Total	($53,896,098)
81			

As is clear from Staff's workpaper, the row labeled "26A Increase for 2017 – 19.07% overall MISO increase" reflects Staff's position that a known and measurable cost increase of

[4] Although, minor differences in the exact amount existed.
[5] Staff's rebuttal workpaper from File No. ER-2016-0179 shown here includes transmission expenses recorded to FERC Account 565 totaling $53,896,098. This total agrees to Staff's Direct Testimony Accounting Schedule 9, page 3 of 6, line 86 column M, total FERC Account 565 Expenses included in Staff's revenue requirement.

$7,353,118 for Schedule 26A rates effective January 1, 2017 was included in Staff's revenue requirement.

Similarly, the following is an excerpt from a true-up workpaper Staff provided to the Company in File No. ER-2019-0335:

11	Schedule			Staff Annualized Amount
49	MISO TRANSMISSION EXPENSES:			
52				
53	1	Scheduling, System Control, and Dispatch		($163,810)
54	2	Reactive Supply and Voltage Control		($398,464)
55	7 & 8	Basic Transmission Revenue		($989)
58	10D & 10E	Demand and Energy Charge (previously split - unhide rows above)		($7,250,962)
59	10F	FERC Annual Charges		($2,976,559)
60	26	Network Upgrade Charge From MTEP		($15,357,115)
61	26A	ARR Pass-Through Rev Associated with MVPs 3/		$224,033
62	26A	MVP Charges (was previously included in 26, split began in Jan 2012)		($50,408,592)
63	26A	2020 MVP Increase Added to 2019 Actual		($3,078,137)
64	26C	TMEP Constructed by MISO TO's		$0
65	26D	TMEP Constructed by PJM TO's	$	(398)
66	33	Blackstart Service	$	(6,893)
67	45	Cost Recovery of NERC Recommendation or Essential Action	$	-

Note the line titled "26A 2020 MVP Increase Added to 2019 Actual". This reflects Staff's position that a known and measurable cost increase of $3,078,137 for Schedule 26A rates effective January 1, 2020, was included in Staff's revenue requirement.

Although I am not aware of any prior history relating to Schedule 9 rate changes that are effective at the beginning of a new year, the facts relevant to Schedule 9 (i.e., a new cost to the Company became effective on January 1st) are exactly the same as those relating to Schedule 26A in both of the prior cases discussed above.

Q. Has Staff made any reference to transmission expenses and how they should be treated in this case?

A. Yes. In Staff witness Karen Lyon's direct testimony, Staff acknowledges Schedule 26-A (Staff utilizes "MVP's" to describe Schedule 26-A below) has rate changes that go into effect January 1 of each year and acknowledges that the cost associated with Schedule 26-A are the majority of the Company's transmission expense and have increased every year.

> "As a transmission customer of MISO the most significant charges Ameren Missouri incurs from MISO are Multi-Value projects ("MVP"). These projects accounted for 64% of Ameren Missouri's total transmission expense during the test year period ending March 31, 2022."[6]

> "MVP's are regional projects that originally began as reliability projects and have since developed into market efficiency projects. When determining the costs for the next year, MISO will estimate a total "revenue requirement" early each year. In September or October of the year prior to the new MISO rates being put into effect, the individual Transmission Owners will estimate what their individual cost allocation responsibility for the total MISO revenue requirement costs will be regarding MVP's. *The new rate for these projects goes into effect in January each year*. Transmission customers are then billed their allocated share of the MVP projects."[7]

> " Staff analyzed Ameren Missouri actual transmission expenses for the period of January 2018 through June 2022 and found that Ameren Missouri's transmission expense has increased every year. A primary driver of the increase is MISO's 26A transmission charges."[8]

Q. Are any other known and measurable rate changes effective January 1, 2023, recommended for true-up in this case?

A. Absolutely. Like the Company's true-up position described above for Schedules 26-A and 9, there are other true-up items in this case where both the Company and Staff have

[6] ER-2022-0337, Karen Lyons Direct Testimony, page 10
[7] ER-2022-0337, Karen Lyons Direct Testimony, page 11 (emphasis added)
[8] ER-2022-0337, Karen Lyons Direct Testimony, page 11

incorporated known and measurable cost changes that are effective January 1, 2023, into each respective revenue requirement.

For example, both the Staff and the Company utilize known and measurable changes to the Company's payroll (i.e., new wage rates) that are in effect on January 1, 2023 to determine the appropriate level of costs to include in rates. Additionally, both Staff and the Company reflect known and measurable changes in coal contract prices to set the appropriate value on coal inventories. Both the Staff and the Company project these January 1, 2023 wage rates onto historical 2022 costs or quantities to determine the appropriate levels of payroll expense and coal inventory used to set rates in this case. Similarly, the Company is reflecting known and measurable January 1, 2023 Transmission Schedule 9 and 26-A rate changes and applying them to historical 2022 parameters that include billing determinants, weighting factors, etc. Transmission Schedule 9 and 26-A costs should reflect the same true-up treatment from Staff for known and measurable costs as payroll and coal inventory.

Q. Please describe the true-up adjustments the Company made regarding costs associated with transmission Schedules 9 and 26-A costs.

A. The Company's true-up revenue requirement includes an adjustment for two known and measurable changes related to the MISO transmission charges under these Schedules which are based on new MISO transmission charge revenue requirements and resulting rates effective January 1, 2023 and that are being charged to the Company for transmission service taken to serve its load starting January 1, 2023. The data elements relied on to calculate these adjustments are historical 2022 information from MISO invoices and rate information effective January 1, 2023, as publicly posted by MISO.

Q. Why should Schedule 26-A transmission costs be trued up for the new rate that became effective January 1, 2023?

Schedule 26-A collects the Attachment MM revenue requirement related MISO's Multi-Value Projects. Schedule 26-A represents approximately two-thirds of the Company's MISO transmission expenses billed to Account 565. Schedule 26-A has been increasing over the last several years as more Multi-Value projects are completed and placed in-service by constructing MISO Transmission Owners.[9] Since the vast majority of Transmission Owners constructing Multi-Value Projects update their annual revenue requirement each January, the total revenue requirement, and resulting rates, generally increases each January. For reference, these Transmission Owners calculate and post their rate calculations in September or October for stakeholder review. The MISO Transmission Owners are also required to hold a joint stakeholder meeting for regional cost-share projects by November 1 of each year. MISO then determines the updated and final total revenue requirement to be collected beginning January 1 of each year.

Q. Have you calculated the annual increase due to the January 2023 rate change in Schedule 26-A charges?

Yes. As shown on Schedule MJL-TUR19, the increase in Schedule 26-A charges due to the January 1, 2023 rate change is expected to be $1,156,817.

Q. Can you please explain the calculation on Schedule MJL-TUR19

In general, the Company calculated the revenue requirement percentage increase applicable to each month and multiplied it by actual 2022 Schedule 26-A invoiced amounts for each month. Schedule MJL-TUR19, line 1 shows the total Schedule 26-A revenue requirement MISO determined for each month of 2022 and used to determine the billed rate for that month. Line 2

[9] As Staff has expressed in Karen Lyon's Direct Testimony pages 10-11

shows the Schedule 26-A revenue requirement MISO used to determine the billed rate effective January 1, 2023. Line 3 simply determines the percent increase for each month. Note that most MISO Transmission Owners that constructed Multi-Value Projects collected under Schedule 26-A update their rates annually effective January 1^{st}. Line 4 reflects the Company's monthly Schedule 26-A expense for 2022. Line 5 multiplies the percent increase on line 3 by the monthly Schedule 26-A expense on line 4. Line 6 is the difference between 2022 Schedule 26-A expense on line 4 and the Schedule 26-A expense adjusted for the revenue requirement (and resulting rates) that became effective January 1,2023 on line 5. Therefore, going forward, the Company expects additional Schedule 26-A expense of $1,156,817 due to the known and measurable increase in Schedule 26-A costs effective January 1, 2023.

Q. What is shown Schedule MJL-TUR20?

A. The purpose of this schedule is to provide a more detailed calculation of how MISO calculates Schedule 26-A costs for a given month. For demonstration purposes, only the month of May is being provided, but every month follows this same process. Schedule MJL-TUR20 demonstrates that this more detailed calculation produces the same result as the calculation on schedule MJL-TUR19, which the Company is utilizing for Schedule 26-A true up.

The left table shows the Schedule 26-A annual revenue requirement that was in effect and billed from January 2022 – May 2022. This totaled $755,753,449. The right table shows the Schedule 26-A annual revenue requirement that was in effect and billed for January 2023 and applicable going forward. The columns on the right show the change in the net revenue requirement is $19,175,317 or 2.54%. Note that these tables show the annual revenue requirement. In order to calculate a rate for each month, MISO applies a monthly weighting factor based on prior years Monthly Net Actual Energy Withdrawals ("MNAEW") so that 100% of the annual revenue requirement is allocated for recovery in specific months. For May 2022, this allocation was 7.5791%.[10]

The bottom table takes these total net revenue requirements and shows how the monthly rate was developed and billed to the Company. The annual net revenue requirement on line 1 is multiplied by the monthly weighting factor on line 2 to obtain the monthly revenue requirement to be collected on line 3. This amount is divided by the total MNAEW on line 4 to obtain the Monthly Schedule 26-A rate on line 5. Line 6 is Ameren Missouri's MNAEW for May 2022. Therefore, Ameren Missouri's Schedule 26-A charge for the month on line 7 is the monthly rate on line 5 times the monthly MNAEW on line 6. For May 2022, this was $3,875,372 for TS0. TS0 refers to billing for the current period, or for May usage. Lines 8-11 are Schedule 26-A billing adjustments that relate to prior periods and result from resettlements in MNAEW as explained above. Therefore, the total charges on the May invoice were $3,917,754, which is consistent with amount shown for May on Schedule MJL-TUR19, line 4. The second column simply starts with the 2023 Schedule 26-A revenue requirement and demonstrates how the rates and charges would change while holding all other factors constant and based on May 2022 billing determinants. Again, the $4,017,157 charge is consistent with amount shown for May on Schedule MJL-TUR19, line 5.

Q. Please summarize the Company's position related to the Schedule 26-A rate change effective January 1, 2023.

A. The cost increase resulting from the Schedule 26-A rate change effective January 1, 2023 is known and measurable, just as it was recognized by both the Company and Staff to have been known and measurable in prior Company rate cases. As the Company has demonstrated, its

[10] MISO posts rate determinants on its website each month.

calculation relies on known and measurable data from 2022 MISO invoices and the currently effective transmission service rates posted by MISO.

Q. Why should Schedule 9 transmission costs be trued-up for a new rate effective January 1, 2023?

A. For exactly the same reason: the Company began paying transmission service rates under Schedule 9 that became effective January 1, 2023. The new revenue requirement and resulting new rate arose from FERC's November 1, 2022, approval of MISO's Tariff filing to add Missouri Joint Municipal Electric Utility Commission ("MJMEUC") as a MISO Transmission Owner in pricing zone 3B, also referred to as the Ameren Missouri ("AMMO") Pricing Zone, effective January 1, 2023.[11] On December 6, 2022, FERC also approved revisions to add MJMUEC as a party to the Joint Pricing Zone Revenue Allocation Agreement effective January 1, 2023.[12] Therefore, beginning in January 2023, the Company began incurring and paying additional transmission service charges arising from MJMUEC's addition to the AMMO Pricing Zone. MJMUEC's addition to the pricing zone is the result of the Hannibal Project, a jointly developed project between Ameren Missouri and MJMUEC. FERC approved the joint ownership agreement on April 7, 2022 in Docket No. ER22-1001. The Commission also approved the arrangement in File No. EM-2022-0292. Reflecting the rate (as determined from the MJMEUC revenue requirement) that became effective on January 1, 2023, in the Company's revenue requirement allows the Company to appropriately recover its cost of service.

[11] Docket No. ER22-2768.
[12] Docket No. ER23-318.

Q. Has Ameren Missouri already made payments under these new Schedule 9 rates in 2023?

A. Yes. The Company has already completed January revenue distribution under the Joint Pricing Zone Revenue Allocation Agreement, and therefore, paid these Schedule 9 charges at the January 1, 2023 rates for transmission service related to its retail load.

Q. Have you calculated the expected annual impact of these Schedule 9 charges?

A. Yes. As shown on Schedule MJL-TUR18, the Schedule 9 charges are expected to be $1,130,421.

Q. Please explain the calculation in Schedule MJL-TUR18.

A. The Company has calculated the incremental annual amount resulting from the MJMEUC revenue requirement that will be paid under Schedule 9 in 2023 based on the currently approved and effective revenue requirement posted publicly by MISO. This revenue requirement is used in calculating the January 2023 Schedule 9 rate of $23,721.3786/MW-YR for the AMMO Pricing Zone. The upper left table on Schedule MJL-TUR18 shows the January 2022 Schedule 9 rate for the AMMO Pricing Zone and then provides a breakdown for the three Transmission Owners that contributed to that revenue requirement. This included Ameren Missouri, Ameren Transmission Company of Illinois and Wabash Valley Power Association, but excludes MJMEUC since the applicable revenue requirement and resulting rate was not effective until January 1, 2023. Note that the annual rate is determined by summing the revenue requirements for all Transmission Owners and dividing by the total load divisor for the pricing zone. The upper right table on the schedule shows the January 2023 Schedule 9 rate for the AMMO Pricing Zone and shows the additional MJMUEC annual revenue requirement of $1,155,850. Therefore, the annual 2023 Schedule 9 rate for the AMMO Pricing Zone is $23,721.3786 /MW-YR and the portion reflecting

MJMUEC's investment is $191.6118 /MW-YR. This information is known and measurable, as the rates used for transmission settlements are posted publicly by MISO so all transmission customers can understand the rates applicable to them when they receive transmission service. The bottom table takes the MJMUEC annual rate on line 1 and determines the monthly rate on line 4 by dividing line 1 by 365 days in the year times the number of days in each month. This calculation is consistent with how MISO settlement statements calculate the Schedule 9 rate that is billed each month. This monthly rate is then multiplied by Ameren Missouri's 2022 native load peaks in the AMMO Pricing Zone on line 5 to determine the applicable, ongoing MJMEUC cost levels (line 6). Ameren Missouri's 2022 native load peaks are also known and measurable because they are reported by MISO on the invoices the Company receives for the services it is provided. In summary, this amount is the product of a known and measurable rate obtained from MISO and the Company's known and measurable 2022 native load peaks obtained from its MISO invoices.

Q. Please summarize the Company's position related to the Schedule 9 rate change effective January 1, 2023.

A. The cost increase resulting from the Schedule 9 rate change effective January 1, 2023 is known and measurable, for the same reasons as describe earlier for Schedule 26-A. The Company has demonstrated, its calculation relies on known and measurable data from 2022 MISO invoices and the currently effective transmission service rates posted by MISO.

Q. Does this conclude your true-up rebuttal testimony?

A. Yes, it does.

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 MITCHELL LANSFORD

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Mitchell Lansford, being first duly sworn states:

My name is Mitchell Lansford, and on my oath declare that I am of sound mind and lawful age; that I have prepared the foregoing *True-Up Rebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

\s\ Mitchell Lansford
Mitchell Lansford

Sworn to me this 24th day of March, 2023.