

Exhibit No.: 852  
Issues: Unreasonable current street lighting tariffs and actions of Ameren and unreasonable proposed increases  
Witness: Robert Kuntz  
Sponsoring Party: City of Ballwin, Missouri  
Type of Exhibit: Direct Testimony – Cost of Service and Rate Design  
File No.: ER-2014-0258  
Date Testimony Prepared: December 18, 2014

MISSOURI PUBLIC SERVICE COMMISSION  
DIRECT TESTIMONY  
OF  
ROBERT KUNTZ  
ON  
BEHALF OF  
CITY OF BALLWIN, MISSOURI

Filed  
March 24, 2015  
Data Center  
Missouri Public  
Service Commission

*St. Louis, Missouri  
December, 2014*

O'Fallon Exhibit No. 852  
Date 2-23-15 Reporter XF  
File No. ER-2014-0258

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE UNION ELECTRIC )  
COMPANY, d/b/a AMEREN MISSOURI'S )  
TARIFFS TO INCREASE ITS REVENUES )  
OR ELECTRIC SERVICE )

File No: ER-2014-0258

AFFIDAVIT OF ROBERT KUNTZ

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

Robert Kuntz, of lawful age on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 3 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

*Robert Kuntz*  
Robert Kuntz

Subscribed and sworn to before me this 18<sup>th</sup> day of December, 2014.



CHRISTINE A. NORTHCUTT  
My Commission Expires  
July 8, 2015  
St. Louis County  
Commission #11425420

*Christine A. Northcutt*  
Notary Public

1 DIRECT TESTIMONY

2 OF

3 ROBERT KUNTZ

4 FILE NO. ER-2014-0258

5 Q. Please state your name and business address.

6 A. My name is Robert Kuntz and my office address is 14811 Manchester Road,  
7 Ballwin, Missouri 63011.

8 Q. By whom are you employed and what is your job title?

9 A. I am the City Administrator for the City of Ballwin, Missouri, and have worked in  
10 that capacity since 1988.

11 Q. Please describe your educational background, work experience and the  
12 duties of your position?

13 A. I received my Bachelor of Arts in Political Science and English from Miami  
14 University in Oxford, Ohio. In 1974 I received my Masters in Public Administration from the  
15 University of Dayton in Dayton, Ohio. From 1979 to 1988 I worked as the City Manager for the  
16 City of Trotwood, Ohio. Between 1976 and 1979 I worked for the Borough of Point Pleasant  
17 Beach, New Jersey.

18 In my position as City Administrator for the City of Ballwin, I supervise all departments  
19 of the City, which includes the management of over 140 fulltime and approximately 250  
20 seasonal employees.

21 Q. Is the City of Ballwin a customer of Ameren?

22 A. Yes. The City of Ballwin receives electric service from Ameren, pursuant to  
23 Ameren's 5(M) tariff, for street lighting, and pays Ameren in excess of half a million dollars per  
24 year for street lighting services.

25 Q. What is the purpose of your testimony?

26 A. I have read Steve Bender's Direct Testimony on behalf of the City of O'Fallon,  
27 Missouri. The City of Ballwin has the same concerns and objections, for the same reasons, as  
28 O'Fallon. I offer further testimony to discuss the issues and impacts on the City of Ballwin, that  
29 are different from those faced by the City of O'Fallon, namely the different service level  
30 provided to Ballwin than O'Fallon, by Ameren.

1           **Q.    How many street lights does Ameren provide for the City of Ballwin?**

2           A.    Ballwin is served by approximately 2,164 street light fixtures of various types  
3 from Ameren. Ameren currently owns all of the light fixtures, which is why Ballwin is subject  
4 to the 5(M) Company-Owned Street and Outdoor Area Lighting Tariffs, which are Ameren  
5 Tariff Sheets numbered 58, 58.2, 58.3, 58.4 and 58.5. A copy of Ameren's most recent street  
6 lighting bill (November 2014) is attached to my testimony as Exhibit A.

7           **Q.    Does Ballwin wish to change to the 6(M) tariff?**

8           A.    Yes. Like the City of O'Fallon, Ballwin would like to change to the 6(M),  
9 customer-owned tariff.

10          **Q.    Why has Ballwin not changed to the 6(M) tariff?**

11          A.    The City of Ballwin has not changed to the 6(M) tariff for the same reasons that  
12 Mr. Bender expressed in his Direct Testimony.

13          **Q.    Have you examined how the proposed increase in the 5(M) tariff will effect**  
14 **Ballwin?**

15          A.    Yes. I have reviewed the increased costs that will be imposed upon Ballwin if the  
16 proposed tariff is approved. Ameren provides service to 1,924 of the "9500 HPS Post Top"  
17 street light fixtures. Under the current 5(M) tariff, Ballwin pays a monthly fee per fixture of  
18 \$21.85, which equates to \$42,039.40 per month for that particular type of fixture. The proposed  
19 amended tariff rate for that same class of fixture is \$23.96 per fixture per month. This equates to  
20 \$46,099.04 per month, which is an increase of \$4,059.64 per month just for this type of street  
21 light fixture. Ballwin receives a 10% discount under the current tariff (Tariff Sheet 58.2).  
22 Ameren's proposed tariff also has a 10% discount. Applying the discount to the these rates  
23 means that under the existing tariff Ballwin is paying \$37,835.46, and under the proposed tariff  
24 Ballwin would pay \$41,489.14, which results in a monthly increase of \$3,653.68. Over the  
25 course of a year, therefore, Ballwin would be paying an additional \$43,844.11 for "9500 HPS  
26 Post Top" street light fixtures, further exacerbating the inequity in Ameren's 5(M) tariff.

27          The City also receives service to 116 "25500 HPS Enclosed" fixtures, which after  
28 applying the discount would see a monthly increase in cost under the proposed tariff from  
29 \$1,778.98 to \$1,950.19 per month. Annualized, this is an increase in cost from \$21,347.76 to  
30 \$23,402.30.

1           The City receives service to 108 “9500 HPS Enclosed” fixtures, which after applying the  
2 discount would see a monthly increase in cost under the proposed tariff from \$1,145.99 to  
3 \$1,256.80. Annualized, that is an increase from \$13,751.88 to \$15,081.60.

4           The City receives service to 10 “9500 Open Bottom” fixtures, which after applying the  
5 discount would see a monthly increase in cost under the proposed tariff from \$93.87 to \$102.96.  
6 Annualized, that is an increase from \$1,126.44 to \$1,235.52.

7           The City receives service to 5 “25500 HPS Direct” fixtures, which after applying the  
8 discount would see a monthly increase in cost under the proposed tariff from \$97.34 to \$106.74.  
9 Annualized, that is an increase from \$1,168.02 to \$1,280.88.

10          The City receives service to 1 “50000 HPS Enclosed” fixture, which after applying the  
11 discount would see a monthly increase in cost under the proposed tariff from \$27.34 to \$29.98.  
12 Annualized, that is an increase from \$328.10 to \$359.75.

13          Based upon these increases, the proposed tariff would result in an increase in the monthly  
14 cost for street lighting services for the City from \$40,978.98 to \$44,935.81. This would equate  
15 to an annualized increase in the cost of service from \$491,747.72 to \$539,229.73. This is a  
16 percentage increase of over 8%. It should be noted that I have not included or accounted for the  
17 Ballwin Municipal Charge that is assessed on the Ameren bills. Further, in performing my  
18 calculation, when necessary I rounded up to 2 decimal places.

19          **Q.     Does this conclude your direct testimony?**

20          **A.     Yes.**



Please Return This Portion With Your Payment.

AMOUNT DUE	DUE DATE
\$44,561.03	Dec 16, 2014
AMOUNT PAYABLE AFTER Dec 29, 2014	ACCOUNT NUMBER
\$45,229.45	49410-03712

Amount Enclosed \$ \_\_\_\_\_

CITY OF BALLWIN  
STREET LIGHT SERVICE  
14811 MANCHESTER RD  
BALLWIN, MO 63011

1

Ameren Missouri  
P.O. Box 88068  
Chicago, IL 60680-1068

40600000 0049410037102 000044561030 000044561030

Keep This Portion For Your Records

ACCOUNT NUMBER	49410-03712
NAME	CITY OF BALLWIN
SERVICE	14811 MANCHESTER RD
AT	BALLWIN, MO 63011

BILL DATE	Dec 4, 2014
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TOTAL AMOUNT DUE BY	Dec 16, 2014	\$44,561.03
DELINQUENT-APTER	Dec 29, 2014	\$45,229.45

Payment Received on Nov 14, 2014 \$44,536.59

Lighting kWh 12/01/2014 109393.0000

SUMMARY

Service To

LIGHTING SERVICE BILLING

Rate 5M Company-Owned Lighting-Municipal  
Municipal Lighting Discount Rider

Service From 11/01/2014 To 12/01/2014

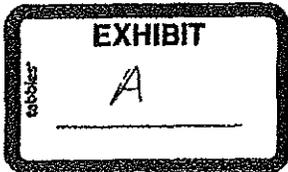
Lighting Charge			\$45,532.19	
Municipal Lighting Discount	46,046.34	@ 1.0000000	\$4,604.63	
Fuel Adjustment Charge	109,393.00 kWh	@ 1.00470000	\$514.15	
Total Service Amount				\$41,441.71
Ballwin Municipal Charge			\$3,119.32	
Total Tax Related Charges				\$3,119.32

QUANTITY	DESCRIPTION	MONTHLY RATE	PRORATE FACTOR	AMOUNT	DATE SERVICE TO
108	9500 HPS Enclosed	11.79	1.0000000	1273.32	Dec 1, 2014
2	9500 HPS Post Top	21.85	1.0000000	43.70	Dec 1, 2014
2	9500 HPS Post Top	21.85	1.0000000	43.70	Dec 1, 2014
3	9500 HPS Post Top	21.85	1.0000000	65.55	Dec 1, 2014
1917	9500 HPS Post Top	21.85	1.0000000	41886.45	Dec 1, 2014
1	50000 HPS Enclosed	30.38	1.0000000	30.38	Dec 1, 2014
116	25500 HPS Enclosed	17.04	1.0000000	1976.64	Dec 1, 2014
5	25500 HPS Direct	21.63	1.0000000	108.15	Dec 1, 2014
10	9500 HPS Open Btm	10.43	1.0000000	104.30	Dec 1, 2014

Current Amount Due	\$44,561.03
Prior Amount Due	\$0.00
Total Amount Due	\$44,561.03

The ActOnEnergy® BizSavers® program has CASH INCENTIVES available for your next energy efficiency project! Everything from lighting to controls to new construction. Visit ActOnEnergy.com/BizSavers to learn more.

A late payment charge of 1.5% will be added for any unpaid balance on all accounts after the delinquent date.



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