

Exhibit No.:  
Issues: Load Forecast  
Witness: David C. Roos  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: EO-2011-0271  
Date Testimony Prepared: November 30, 2011

**MISSOURI PUBLIC SERVICE COMMISSION**

**REGULATORY REVIEW DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**DAVID C. ROOS**

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

**CASE NO. EO-2011-0271**

**Jefferson City, Missouri**

***November 2011***

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of Union Electric )  
Company's 2011 Utility Resource Filing ) Case No.: EO-2011-0271  
Pursuant to 4 CSR 240 – Chapter 22 )

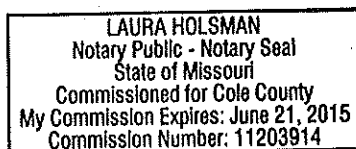
**AFFIDAVIT OF DAVID C. ROOS**


STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE        )

David C. Roos, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 3 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal 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.

  
\_\_\_\_\_  
David C. Roos

Subscribed and sworn to before me this 29<sup>th</sup> day of November, 2011.



  
\_\_\_\_\_  
Notary Public

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

**SURREBUTTAL TESTIMONY**

**OF**

**DAVID C. ROOS**

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

**CASE NO. EO-2011-0271**

Q. Please state your name and business address.

A. My name is David C. Roos, and my business address is Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

Q. What is your present position at the Missouri Public Service Commission?

A. I am a Regulatory Economist in the Energy Department of the Utility Operations Division.

Q. Are you the same David C. Roos that contributed to Staff's Report on Electric Utility Resource Planning Compliance Filing filed on June 23, 2011 and rebuttal testimony in this case?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A. I address certain rebuttal testimony of Missouri Department of Natural Resources' (DNR) witness John P. Davulis related to Union Electric Company d/b/a Ameren Missouri's (Ameren Missouri's or Company's) construction of the household income variable used in Ameren Missouri's residential sales forecast; and the validity of Ameren Missouri's end-use load profiles.

Q. What is Mr. Davulis' concern with Ameren Missouri's construction of the income variable used in the Company's residential sales forecast?

1           A.     Mr. Davulis is concerned that Ameren Missouri's forecast of average  
2 household income is too high and results in an upward bias of the Company's residential sales  
3 forecast. Mr. Davulis suggests a method to calculate average household income which results  
4 in a forecast for average household income that by the year 2030 is about 8.7% lower than  
5 Ameren Missouri's average household income forecast. Based on the reasonable premise that  
6 a portion of household energy usage can be explained by the level of average household  
7 income, a lower average household income drives a lower household energy usage, all else  
8 equal.

9           Q.     Is Staff concerned that this issue remains unresolved in this case?

10          A.     No.   Staff found no Rule CSR 4 CSR 240-22.030 Load Analysis and  
11 Forecasting deficiency with Ameren Missouri's integrated resource planning process. The  
12 Commission's resource planning rules require the development of high, base and low-case  
13 forecasts that are used for integrated resource analysis, risk analysis and strategy selection.  
14 This gives the utility's decision-makers the opportunity to assess the impact that load  
15 uncertainty has on the resource plan the utility selects as its preferred resource plan. Further, if  
16 the Company were to adjust the residential sales forecast to correct for an upward bias, the  
17 result would be a lower residential sales forecast. The Company's preferred plan first calls  
18 for construction of a new generating facility in 2029. This time frame gives the Company  
19 several opportunities to refine its load forecast prior to making any final decision to construct  
20 a new generating facility. Staff is expecting Ameren Missouri, in its 2012 annual update  
21 filing, to update its load forecasts to reflect recent changes in customers' usages.

22          Q.     What is Mr. Davulis' alleged deficiency related to Ameren Missouri's end-use  
23 load profiles?

Surrebuttal Testimony of  
David C. Roos

1           A.     It is Mr. Davulis' position that "Ameren Missouri has not provided convincing  
2 evidence that the end-use load profiles it uses are appropriate for its service territory<sup>1</sup>." In his  
3 rebuttal testimony Mr. Duvalis compares Ameren Missouri's residential and commercial  
4 cooling end-use contributions to peak demand with similar variables from studies by others  
5 (Electric Power Research Institute (EPRI) and KEMA, Inc.). These comparisons suggest that  
6 Ameren Missouri may have undervalued the residential non-cooling efficiency measures and  
7 commercial cooling and lighting energy efficiency measures in its study.

8           Q.     What is Staff's response to Mr. Davulis' analysis?

9           A.     The potential for certain energy efficiency measures to be undervalued is a  
10 valid concern, but it does not make Ameren Missouri's study deficient under Rule 4 CSR  
11 240-22.030 Load Analysis and Forecasting.

12          Q.     Does this conclude your surrebuttal testimony?

13          A.     Yes.

---

<sup>1</sup> Rebuttal Testimony of John P. Davulis at page 2; lines 20 and 21.