Exhibit No.: Issues: Revenue Witness: James Sponsoring Party: MO PS Type of Exhibit: Rebutta Case No.: ER-200 Date Testimony Prepared: January

Revenues James A. Busch MO PSC Staff Rebuttal Testimony ER-2007-0002 January 31, 2007

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

REBUTTAL TESTIMONY

OF

JAMES A. BUSCH

UNION ELECTRIC COMPANY d/b/a

AMERENUE

CASE NO. ER-2007-0002

Jefferson City, Missouri January 2007

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Union Electric Company) d/b/a AmerenUE for Authority to File) Tariffs Increasing Rates for Electric) Service Provided to Customers in the) Company's Missouri Service Area.)

Case No. ER-2007-0002

AFFIDAVIT OF JAMES A. BUSCH

STATE OF MISSOURI)) ss COUNTY OF COLE)

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

James A. Busch

Subscribed and sworn to before me this 30^{44} day of January, 2007.



SUSAN L. SUNDERMEYER My Commission Expires September 21, 2010 Callaway County Commission #06942086

Notary Public

9-21-10 My commission expires

1		REBUTTAL TESTIMONY
23	OF	
4 5	JAMES A. BUSCH	
6 7		UNION ELECTRIC COMPANY d/b/a
8 9		AMERENUE
10 11		CASE NO. ER-2007-0002
12 13		
14 15	Q.	Please state your name and business address.
16 17	A.	My name is James A. Busch and my business address is P. O. Box 360,
18	Jefferson City, Missouri 65102.	
19	Q.	By whom are you employed and in what capacity?
20	A.	I am a Regulatory Economist III in the Economic Analysis Section of the
21	Energy Department, Utility Operations Division of the Missouri Public Service Commission	
22	(Staff).	
23	Q.	Are you the same James A. Busch that filed direct testimony earlier in this
24	proceeding?	
25	A.	Yes I am.
26	Q.	What is the purpose of your rebuttal testimony in this case?
27	A.	The purpose of my rebuttal testimony is to address the direct testimony of
28	AmerenUE witness James Pozzo.	
29	Q.	What is the difference between the way Staff and AmerenUE weather
30	normalized revenues?	
	1	

Rebuttal Testimony of James A. Busch

1 The difference between Staff and AmerenUE is in how the weather A. 2 normalized usage adjustment is priced out. There are various ways to price out the change in 3 usage due to the weather adjustment when a company has blocked energy rates. One way 4 would be to price out the change in usage based on the first block energy charge assuming the 5 entire change in usage occurred in the first block. Another way would be to price out the 6 change in usage based on the tail block energy charge assuming the entire change in usage 7 occurred in the tail block. Then there are ways to price out the adjustment based on some 8 energy charge in between. Staff utilized a method that averages the energy charge by 9 spreading the usage changes to all blocks. AmerenUE utilized a method that assumes the 10 entire change in usage occurred in the tail block.

Staff believes that its method of pricing out the change in usage by assuming
that it occurs in all blocks is more reasonable than AmerenUE's method.

13

Q. Why is Staff's method more reasonable?

A. Staff does not believe that changes in usage due to weather normalization only occurs in the tail block. For example, in order for a residential customer to reach the tail block price, they must use more than 750 kWhs in a given non-summer month. If every residential customer uses at least 750 kWhs in every winter month, all of the changes due to weather normalization would occur in the tail block; however, that is not the case.

19

Q. Please explain.

A. Please look at the residential usage for January 2006. Residential usage for
January 2006 were 636,950,682 kWh. If every customer reached the tail block rate, usage for
all customers should exceed the 750 kWh threshold. It does not, however. In January of
2006, AmerenUE had 1,018,018 residential customers. Multiplying those 1,018,018

2

Rebuttal Testimony of James A. Busch

customers times the 750 kWh first block limit is 763,513,500 kWhs. Total residential usage
 for January 2006 was 639,950,682 kWhs, or 126,562,818 kWhs less then if every customer
 used enough kWhs to reach the tail block. Thus, Staff believes that its method of pricing out
 the change in usage in both blocks is the most reasonable method.

- Q. Was the same method used for the non-residential classes?
- A. Yes.

5

6

7

8

- Q. Does this conclude your rebuttal testimony?
- A. Yes.