

Exhibit No.:
Issue(s): Rate Base;
Discrete Adjustment
Witness: Pamela Harrison
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Union Electric Company
File No.: GR-2024-0369
Date Testimony Prepared: April 4, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. GR-2024-0369

REBUTTAL TESTIMONY

OF

PAMELA HARRISON

ON

BEHALF OF

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

**St. Louis, Missouri
April, 2025**

REBUTTAL TESTIMONY

OF

PAMELA HARRISON

FILE NO. GR-2024-0369

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Pamela S. Harrison. My business address is One Ameren Plaza,
1901 Chouteau Ave., St. Louis, Missouri.

**Q. Are you the same Pamela Harrison that submitted direct testimony in
this case?**

A. Yes, I am.

Q. To what testimony or issues are you responding?

A. My rebuttal testimony provides updates related to the discrete adjustment
investment, Phase 2 of the Northeast Territory Project (Staff witness Matthew R. Young).

**Q. Please provide an update on the construction progress for Phase 2
Northeast Territory Project.**

A. Construction of Phase 2 is progressing steadily with approximately 11 miles of
the 14-mile pipeline route trenched. All mainline pipe welding has been completed with the
exception of section tie-in welds. Approximately 4 miles of pipe is installed in the trench and
backfilled. The horizontal directional drilling bore has been completed along with all
conventional bores. Tie-in welds have started. Commissioning of the pipeline will commence
following tie-ins and upon completion of pipeline testing.

1 **Q. Will costs for Phase 2 of the Northeast Territory Project be known and**
2 **measurable prior to operation of law date in this case?**

3 A. Yes, Ameren Missouri anticipates Phase 2 of the Northeast Territory Project
4 will be placed in service in July 2025, at which time, cost will be known and measurable, prior
5 to the September 1, 2025 operation of law date.

6 **Q. Have there been any changes to the projected cost of Phase 2 Northeast**
7 **Territory project since direct testimony was filed?**

8 A. Yes, as construction progresses and construction activities are completed,
9 unused contingency line items are released for those completed construction activities with
10 known costs. Total projected cost of Phase 2 is currently forecasted to be \$47.6 million.

11 **Q. Is Staff's recommended reduction to the Phase 2 Northeast Territory**
12 **project investment appropriate in this case?**

13 A. No, disallowing \$9 million in contingency from Phase 2 based on the
14 assumption that the actual costs of Phase 1 were \$9 million less than the original estimate is an
15 invalid and arbitrary assumption. The Phase 2 project was estimated based on construction
16 specifications, required materials and unique construction characteristics for that section of
17 pipeline. Approximately \$19 million has been expended on Phase 2 through March 31, 2025,
18 with a total forecast of \$47.6 million through the end of construction including \$7.5 million
19 remaining in contingency line items. Ameren Missouri will provide additional updates in true-
20 up direct testimony and at evidentiary hearings, as necessary. Additionally, the rebuttal
21 testimony of Ameren Missouri witness Stephen J. Hipkiss proposes a one-way tracker to ensure
22 customers pay no more than the actual cost of the project.

1 **Q. Does this conclude your rebuttal testimony?**

2 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 Natural Gas Service.) File No.: GR-2024-0369

AFFIDAVIT OF PAMELA HARRISON

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

Pamela Harrison, being first duly sworn on her oath, states:

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


Pamela Harrison

Sworn to me this 2nd day of April, 2025.