

*Exhibit No.:*  
*Issue(s):* Rate Design  
*Witness:* Keri Roth  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2024-0369  
*Date Testimony Prepared:* April 4, 2025

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**WATER, SEWER, GAS, & STEAM DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**KERI ROTH**

**UNION ELECTRIC COMPANY,  
d/b/a Ameren Missouri**

**CASE NO. GR-2024-0369**

*Jefferson City, Missouri  
April 2025*

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1           A.     Ameren Missouri currently has five rate classes each with their own rate  
2 structure. The rate classes include Residential Service, General Service, Interruptible,  
3 Standard Transportation, and Large Volume Transportation. Each class includes a monthly  
4 customer charge and a volumetric delivery charge. For all classes except Residential Service,  
5 the volumetric delivery charge has two tiers divided at the 7,000 hundred  
6 cubic feet (“Ccf”) threshold.<sup>1</sup>

7           Q.     What rate design changes is Ameren Missouri proposing in this case?

8           A.     Ameren Missouri is not proposing any overall changes to the existing rate  
9 classes or rate structures.<sup>2</sup>

10          Q.     Can you please contrast Ameren Missouri’s proposed rates with Staff’s  
11 proposed rates?

12          A.     Yes. Residential Service, General Service and Interruptible Service classes each  
13 received an equal percentage increase to each rate element in its class, based on its calculated  
14 cost of service. Ameren Missouri increased each rate element in each class by approximately  
15 50.93%. Staff increased each rate element in each class by approximately 36.14%.

16          The main differences between Staff and Ameren Missouri’s approach to increasing rates  
17 falls within the Standard Transportation and Large Volume Transportation rate classes.  
18 Staff continued its proposed equal percentage increase to each rate element in each class,  
19 increasing each rate element by approximately 36.14%. Ameren Missouri,  
20 however, has included adjustments for rate switching and revenue neutral shifts between the  
21 two classes, as well as kept some rate elements constant. For example, the monthly

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<sup>1</sup> Michael W. Harding, Ameren Missouri Direct Testimony, pages 5 – 6.

<sup>2</sup> Michael W. Harding, Ameren Missouri Direct Testimony, page 5, lines 6 – 7.

Rebuttal Testimony of  
Keri Roth

1 Administration Charge for the electronic gas meter, within each class was kept constant.  
2 Additionally, Ameren Missouri kept the School Entities rate constant under  
3 Standard Transportation, as well as the monthly Customer Charge for the Large Volume  
4 Transportation rate class. Ameren Missouri also kept the initial rate block amongst all  
5 non-residential classes consistent to help disincentivize rate switching.

6 Q. Did Staff make any changes to its proposed rate design to  
7 disincentivize rate switching?

8 A. Similar to Ameren Missouri, Staff also kept the initial rate block amongst all  
9 non-residential classes consistent to help disincentivize rate switching.

10 Q. Does this conclude your rebuttal testimony?

11 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        )

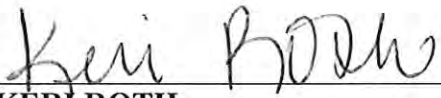
Case No. GR-2024-0369

**AFFIDAVIT OF KERI ROTH**

STATE OF MISSOURI       )  
                                      )  
COUNTY OF COLE        )       ss.

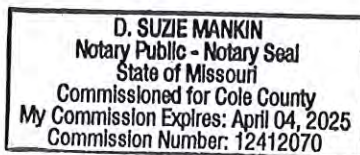
**COMES NOW KERI ROTH** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Keri Roth*; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.

  
KERI ROTH

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1<sup>st</sup> day of April 2025.



  
Notary Public