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Case No.: GR-2024-0369

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

UNION ELECTRIC COMPANY

D/B/A AMEREN MISSOURI

FILE NO. GR-2024-0369

April 4, 2025

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REBUTTAL TESTIMONY

OF

LENA M. MANTLE

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CASE NO. GR-2025-0369

Introduction

Q. Would you state your name and business address?

A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson City, Missouri 65102. I am a Senior Analyst for the Office of the Public Counsel (“OPC”).

Q. Would you describe your experience and your qualifications?

A. I started working for the OPC in my current position as a Senior Analyst in August 2014. In this position, I advise the Public Counsel and provide expert testimony on a variety of topics including the implementation of interim rate mechanisms. Prior to working for the OPC, I worked for the Missouri Public Service Commission Staff (“Staff”) from August 1983 until I retired in December 2012. During my employment on Staff, I worked as an Economist, Engineer, Engineering Supervisor, and Manager of the Energy Department.

Attached as Schedule LMM-R-1 is a brief summary of my experience with OPC and Staff along with a list of the Commission cases in which I filed testimony, Commission rulemakings in which I participated, and Commission reports to which I contributed. I am a Registered Professional Engineer in the State of Missouri.

Q. Who are you responding to in this rebuttal testimony?

A. I am responding to the direct testimony of Ameren Missouri witness Michael W. Harding. Specifically, I am responding to the revisions he recommends to the Weather Normalization Adjustment Rider tariff sheets nos. 32 and 32.1 in his schedule MWH D-3.

1 **Q. What is the purpose of your rebuttal testimony?**

2 A. The purpose of this rebuttal testimony is to propose additional changes to Ameren
3 Missouri's proposed tariff sheet nos. 32 and 32.1 to correct errors and clarify the
4 description of Ameren Missouri's WNAR. I also recommend changes to Ameren
5 Missouri's currently effective tariff sheet no. 32.2 to correct errors and ensure that
6 the tariff sheet language regarding the cap on the WNAR rate is correctly observed.

7 The purpose of tariff sheet nos. 32 and 32.1, along with sheet no. 32.2, is to
8 accurately describe the WNAR. As I reviewed the tariff sheets changes proposed
9 by Ameren Missouri and the currently effective WNAR tariff sheets, I found that
10 all three WNAR tariff sheets were inaccurate and confusing. Additionally, I
11 discovered on tariff sheet no. 32.2 that the WNAR rate of \$0.0712 per Ccf that is
12 currently being charged customers does not meet the requirements found on tariff
13 sheet no. 32.1 that the WNAR rate be capped at \$0.05 per Ccf.¹

14 My recommended tariff language and a redline/strikeout version of
15 language proposed by Ameren Missouri witness Harding for tariff sheets nos. 32
16 and 32.1 are attached as Schedules LMM-R-2 and LMM-R-3. Likewise, Schedule
17 LMM-R-4 is my proposed language for the currently effective tariff sheet no. 32.2
18 and a redline/strikeout of the differences to the currently effective tariff sheet. This
19 is the structure of the tariff sheet that the Commission should order Ameren
20 Missouri to file when it next changes its WNAR rate. For reasons outlined further
21 in this testimony, the Commission should order in this case the current tariff sheet
22 no. 32.2 be changed as provided in Schedule LMM-R-5.

23 **Q. What changes does Mr. Harding recommend to tariff sheets no. 32 and 32.1 in**
24 **his direct testimony?**

25 A. He recommends the removal of language referencing the Delivery Charge
26 Adjustment ("DCA") from the WNAR tariff sheets since the DCA has been

¹ The Commission approved the rate based on the recommendation of Staff in GT-2025-0082.

1 terminated and all remaining balances have been addressed as previously approved
2 by the Commission.² He also recommends the addition of two numbers within
3 tariff sheet no. 32.1 consistent with Ameren Missouri's position in its filed case:
4 (1) updating the β coefficient to be consistent with the measure of weather
5 responsiveness Ameren Missouri measured in weather normalizing usage in this
6 case, and (2) the residential delivery charge consistent with the residential delivery
7 charge it proposed in this case.³

8 **Q. Do you agree with Mr. Harding's recommended changes?**

9 A. Yes. The language referencing the DCA should be removed from the WNAR tariff
10 sheets. I also agree that the coefficient and the delivery charge should be updated.
11 However, the correct numbers will not be available until after a Commission order
12 in this case.

13 **Recommended Changes to Tariff Sheet No. 32**

14 **Q. Would you summarize your recommended changes for tariff sheet no. 32?**

15 A. My recommended changes, in context, can be found on Schedule LMM-R-2. One
16 of the first conflicts in this tariff sheet occurs under the "FILING" heading. The
17 tariff sheet states that the filing of the WNAR will be made "to be effective for the
18 November billing month." However, under the subheading "WEATHER
19 NORMALIZATION ADJUSTMENT RIDER (WNAR)" at the top of tariff sheet
20 32.2 says the WNAR rate is "[a]pplicable to services provided on November 1,
21 2024, through October 31, 2025." This states the rate is applied based on a date,
22 not the billing month. The tariff sheets should be consistent – billing month or date
23 certain. In my proposed tariff sheet language, I stayed consistent with the billing
24 month. However, it could be changed to a certain date – say November 1 through

² Harding Direct, pages 34 – 35.

³ Page 35.

1 October 31. The tariff sheet language, and implementation, just needs to be
2 consistent.

3 Mr. Harding’s proposed tariff sheet no. 32 provides an equation for the term
4 WA. WA is defined as the “Weather adjustment *amount* to be collected from the
5 Residential service class”. (Emphasis added). However, close examination of the
6 equation reveals that WA as defined on this tariff sheet is a rate, not an amount.
7 The variables in the denominator of the equation are dollar amounts and the
8 numerator, while stated as “Residential sales” is actually residential billed usage.
9 Therefore, the result of this equation is a dollars per Ccf rate. WA is the WNAR
10 rate, but this is not explicitly stated anywhere on the WNAR tariff sheets.⁴
11 Therefore, the tariff sheet should be changed to clearly reflect that this calculation
12 defines how the rate customers are paying was calculated.

13 In addition, the definition of WA, cited above, states that WA is an amount
14 that would “be collected,” implying that this rate will always be positive; collecting
15 additional revenue from customers. My recommended change is that WA be
16 defined as “Weather adjustment rate to be applied to recovery period usage.” This
17 is a more accurate definition of the term WA.

18 This sheet also has an equation for a term that it labels Total Weather
19 Adjustment or TWA. However, this “Total Weather Adjustment” equation
20 includes the variable AR or annual reconciliation. AR is defined as the difference
21 between the dollar amount that was supposed to be recovered and what actually
22 was recovered in the previous two recovery periods. AR is not a weather
23 adjustment but a true up of the WNAR. Therefore, the label “TWA” as the sum of
24 these two amounts is misleading. To clarify, I recommend that the two terms
25 included in the current sheet variable named TWA be moved to the denominator of
26 equation of WA as two variables – the annual weather adjustment dollar amount or
27 AWNA and AR.

⁴ The WNAR rate is referred to as “WR” not “WA” on tariff sheet no. 32.2.

1 Also, the definition of the annual reconciliation term AR is very confusing.
2 I proposed a revised definition with the intent to be clearer regarding the annual
3 reconciliation variable.

4 I also added the amount deferred (AD) variable to the equation of WA. This
5 variable captures any amount that was not collected in the previous recovery period
6 due to the cap of \$0.05 per Ccf on the WNAR rate. The current tariff sheets do not
7 include the provision of this deferred amount in the calculation of WA but language
8 currently on tariff sheet 32.2 states that “[a]ny WA in excess of \$0.05 per Ccf will
9 be deferred for recovery from customers in the next WA recovery period.” My
10 proposed change would clarify that any deferred amount would be included in the
11 calculation of the WNAR rate.

12 Finally, I added a definition for recovery period and, for clarity, moved the
13 language regarding the limit of \$0.05 per Ccf from tariff sheet 32.1 to this sheet
14 after the definition of WA. Schedule LMM-R-2 has other less substantial changes
15 intended to make the tariff sheet clearer and more accurate.

16 **Recommended Changes to Tariff Sheet No. 32.1**

17 **Q. Would you summarize your recommended changes for tariff sheet no. 32?**

18 A. My recommended changes to tariff sheet 32.1 are shown on Schedule LMM-R-3.
19 Both Mr. Harding’s proposed tariff sheet no. 32.1, and the current tariff sheet 32.1,
20 start with an equation that is labeled as weather normalized adjustment factor or
21 WNA Factor. However, the equation provided for WNA does not calculate a factor
22 but instead calculates the adjustment to usage for the difference in weather through
23 normal and actual heating degree days. Therefore, I changed the name of the
24 variable to “WNU” and defined it as the weather normalization adjustment to usage.
25 I also added some information to explain that the β coefficients are the residential
26 weather responses measured in the general rate cases.

1 **Q. Why are there two β coefficients on the tariff sheets you and Mr. Harding are**
2 **proposing?**

3 A. Because of the timing of the annual WNAR period and when the tariff sheets
4 implementing the changes from this rate case go into effect. Currently Ameren
5 Missouri's proposed tariff sheets are suspended through September 1, 2025.⁵ The
6 current annual WNAR period will end prior to that suspension date with the July
7 2025 billing month. The next annual WNAR period will include August 2025
8 billing month and part of the September 2025 billing month to which the currently
9 effective β applies. Therefore, the tariff sheets need to contain the β coefficient for
10 the time period *prior to* the effective date of new rates and the β coefficient that
11 will be in effect with the new tariff sheets.

12 **Q. Is WNU the only variable name you changed on tariff sheet no. 32.1?**

13 A. No. I also changed the name of the Weighted Variable Rate ("WVR") to
14 distribution delivery charge or DC.

15 **Q. Why?**

16 A. Both the current tariff sheet no. 32.1 and Mr. Harding's proposed tariff sheet no.
17 32.1 defines WVR to be the weighted volumetric rate. WVR is defined as the
18 residential distribution delivery rate charged to customers. There is no weighting
19 involved in this rate so including the term "weighted" causes confusion. This
20 variable is actually the Residential Service Rate distribution delivery rate found
21 on tariff sheet no. 5. On tariff sheet no. 5, this rate is called the "Delivery
22 Charge." Therefore, in order to be consistent and reduce confusion, I changed the
23 name of this variable on tariff sheet no. 32.1 to Residential Delivery Charge or
24 DC.

⁵ *Order Suspending Tariff, Giving Notice Of Contested Case Status, And Delegating Authority*, effective October 9, 2024.

1 **Q. Why are there two DCs included on Sheet 32.1?**

2 A. For the same reason that there are two β coefficients. The first recovery period after
3 these tariff sheets go into effect will have some usage to which the current delivery
4 charge applies. Including the currently effective DC preserves that charge for the
5 calculation of the monthly WNA prior to and after the new tariff sheets are
6 approved.

7 **Q. Is this a comprehensive listing of the changes that you are recommending to**
8 **tariff sheet no. 32.1?**

9 A. No. Schedule LMM-R-3 has other less substantial changes which are also
10 important to the clarity and accuracy of the tariff sheet.

11 **Recommendations to Tariff Sheet No. 32.2**

12 **Q. Did Mr. Harding propose any changes to tariff sheet 32.2?**

13 A. No, he did not.

14 **Q. What is the purpose of tariff sheet no. 32.2?**

15 A. This tariff sheet changes between rate cases to show the calculation of the current
16 WNAR rate. Tariff sheet nos. 32 and 32.1 describe how it is calculated. This tariff
17 sheet changes annually with the new WNAR rate.

18 **Q. Why is it necessary to change tariff no. 32.2 in this case?**

19 A. The changes I recommend to tariff sheet nos. 32 and 32.1 affect tariff sheet no. 32.2
20 too. The need for changes is evident in the heading on tariff sheet 32.2 of
21 **Calculation of Current Weather Adjustment Rate (WR)**. “WR” is not defined
22 on the current sheet nos. 32 or 32.1. The acronym for the weather adjustment rate
23 is WA. Therefore, the acronym WR on this sheet needs to be replaced with “WA.”

1 **Q. What other changes to tariff sheet no. 32.2 would be necessary given the**
2 **changes you are proposing?**

3 A. The equation for WA that I recommend on tariff sheet no. 32 has four variables in
4 the denominator in calculating the rate. The table on the current tariff sheet no.
5 32.2 only includes three of these variables. There needs to be a row in the table for
6 the amount deferred, if any, if the rate cap is hit in the prior recovery period.

7 In addition, the current tariff sheet includes a calculation of the total weather
8 adjustment as the sum of the annual reconciliation (AR) and the Sum of Monthly
9 WNA (AWNA). As I previously explained, AR is a reconciliation not a weather
10 adjustment and should not be defined as such. Therefore, I recommend changing
11 the title of the line on tariff sheet 32.2 labeled "Total Weather Adjustment (TWA)"
12 to "Total Amount to be Collected." This total includes the sum of the monthly
13 weather adjustments, the annual reconciliation, the amount deferred from the
14 previous recovery period, and any ordered adjustment which should also be shown
15 on this tariff sheet.

16 **Q. Are you recommending anything else be added to this sheet?**

17 A. Yes. When I was reviewing this sheet to make sure it would be consistent with
18 tariff sheet nos. 32 and 32.1, I realized that the currently effective WNAR rate is
19 \$0.0712, which is above the WNAR rate cap of \$0.05 per Ccf provided in tariff
20 sheet no. 32.1. Therefore, I added rows to the table to make sure that this cap would
21 not be overlooked in the future.

22 **Q. What is your recommendation regarding the rate being above the cap for this**
23 **recovery period?**

24 A. The cap of \$0.05 per Ccf does not restrict the weather normalization adjustment
25 dollar amounts collected from the customers; it just increases the time over which
26 the amount is collected. If the rate had been capped as required by tariff sheet
27 no. 32.1, customers would have still had to pay the amount that would be collected

1 by the \$0.0212 above the cap of \$0.05 in the next recovery period. Most of the
2 usage for the recovery period of November 2024 through October 2025 has been
3 incurred⁶ and that usage has billed the rate of \$0.0712 per Ccf. Therefore, most of
4 the amount to be collected has been billed. Therefore, my recommendation is the
5 adoption of my proposed tariff sheet no. 32.2 as provided on Schedule LMM-R-5
6 with the currently ordered rate of \$0.0712 per Ccf. I also recommend that the
7 Commission approve my proposed changes to tariff sheet nos. 32 provided on
8 Schedule LMM-R-2 to prevent this customer bill protection from being overlooked
9 going forward.

10 **Q. Will the current rate of \$0.0712 per Ccf change before the tariff sheets for this**
11 **rate case are approved and go into effect?**

12 A. No. According to tariff sheet no. 32, the current WNAR rate is effective through
13 the October 2025 billing month. The operation of law date for this case is
14 September 1, 2025.

15 **Q. Tariff sheet no. 32.2 that you are proposing in Schedule LMM-R-4 does not**
16 **allow the WNAR rate to be greater than \$0.05 per Ccf. Will the tariff sheet**
17 **that you provide in Schedule LMM-R-4 be appropriate to go into effect with**
18 **the tariff sheets that implement the Commission's order in this case?**

19 A. No. Therefore, I am recommending the proposed tariff sheet no. 32.2 on Schedule
20 LMM-R-5 be ordered with the tariff sheets in this case and the Commission order
21 the tariff sheet no. 32.2 on Schedule LMM-R-4 be filed when Ameren Missouri
22 requests to change the WNAR rate for the next recovery period.

⁶ The majority of the usage is billed in the heating months of November through March.

Conclusion

Q. Would you summarize your rebuttal testimony?

A. Ameren Missouri's current tariff sheets that are intended to describe the WNAR are riddled with inaccuracies and mistakes. The tariff sheets should be revised to accurately and clearly describe the WNAR approved by the Commission.

Ameren Missouri witness Harding recommends some necessary changes to two of the current tariff sheets, but he does not attempt to clarify or correct the WNAR tariff sheets. Instead, he merely updates the currently inaccurate tariff sheets. Therefore, the Commission should approve the changes to the tariff sheet nos. 32, 32.1, and 32.2 attached to this testimony in Schedules LMM-R-2, LMM-R-3, and LMM-R-5. The Commission should also order Ameren Missouri, when it updates its WNAR rate, to file consistent with the tariff sheet no. 32.2 as provided in LMM-R-4.

Due to the complexity of this rider and the inherent difficulty of documenting complex riders accurately and simplistically, I may have missed or mischaracterized portions of this rider. I look forward to working with Ameren Missouri to achieve an accurate description of this rider in its tariff.

Q. Does this conclude your rebuttal testimony?

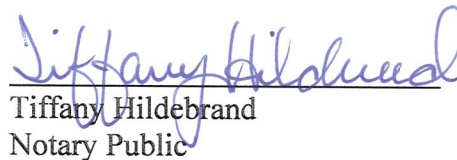
A. Yes, it does.

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Adjust Its Revenues) Case No. GR-2024-0369
for Natural Gas Service)

STATE OF MISSOURI)
) SS
COUNTY OF COLE)

1. My name is Lena M Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Subscribed and sworn to me this 2nd day of April 2025.



My Commission expires August 8, 2027.