

Exhibit No.:
Issue(s): *Weather Normalization
Adjustment Rider*
Witness: *Michael J. Abbott*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal/True-Up Direct
Testimony*
Case No.: *GR-2024-0369*
Date Testimony Prepared: *May 2, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, GAS, AND STEAM DEPARTMENT

SURREBUTTAL/TRUE-UP DIRECT TESTIMONY

OF

MICHAEL J. ABBOTT

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

CASE NO. GR-2024-0369

*Jefferson City, Missouri
May 2025*

1 **SURREBUTTAL/TRUE-UP DIRECT TESTIMONY**

2 **OF**

3 **MICHAEL J. ABBOTT**

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

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

7 Q. Please state your name and business address.

8 A. My name is Michael J. Abbott. My business address is 200 Madison Street,
9 P.O. Box 360, Jefferson City, Missouri 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed with the Missouri Public Service Commission (“Commission”)
12 as a Senior Project Manager with the Water, Sewer, Gas, and Steam Department,
13 Industry Analysis Division.

14 Q. Please describe your educational background and work experience.

15 A. My credentials, work experience, and listing of cases in which I have previously
16 filed testimony before the Commission are attached to this testimony as Schedule MJA-s1.

17 Q. What is the purpose of your surrebuttal/true-up direct testimony?

18 A. I am providing surrebuttal testimony in response to the Office of Public Counsel
19 (“OPC”) Lena Mantle’s rebuttal testimony regarding Union Electric Company
20 d/b/a Ameren Missouri (“Ameren Missouri”) Weather Normalization Adjustment Rider
21 (“WNAR”). More specifically, Commission Staff (“Staff”) is contesting Mrs. Mantle’s rebuttal
22 testimony recommending additional changes to Ameren Missouri’s proposed tariff sheet
23 nos. 32, 32.1, and 32.2 and misinterpretation of the WNAR (rate/adjustment) of \$0.0712/Ccf¹.

¹ Ccf is 100 cubic feet.

1 Q. What are Mrs. Mantle's proposed change recommendations?

2 A. Mrs. Mantle is recommending changes to Ameren Missouri's proposed tariff
3 sheet nos. 32², 32.1³, and 32.2⁴.

4 Q. Does Staff contest all change recommendations by Mrs. Mantle?

5 A. No.

6 Q. What are the change recommendations from Mrs. Mantle that Staff contest
7 specific to Ameren Missouri's proposed tariff sheet no. 32?

8 A. Mrs. Mantle's recommendations include changes to the existing
9 Weather Normalization Adjustment Calculations (i.e., formula), redefining existing terms,
10 and adding new definitions. Staff opposes all change recommendations as established in
11 Mrs. Mantle's rebuttal testimony Schedule LMM-R-2 under the sub-header
12 "WEATHER NORMALISZATION ADJUSTMENT CALCULATIONS". Staff disagrees with
13 the changes as they are not necessary and provide no benefit to the calculation or clarity of
14 WNARs as recently supported with Ameren Missouri's most recent WNAR
15 filing GT-2025-0082⁵

16 Q. What are the change recommendations from Mrs. Mantle that Staff contests
17 specific to Ameren Missouri's proposed tariff sheet no. 32.1?

18 A. Mrs. Mantle's recommendations include changes to redefining
19 Weather Normalization Adjustment as well as components in the formula utilized for the
20 Weather Normalization Adjustment as represented with WNA_i . Additionally, Mrs. Mantle is
21 recommending changes to how the "dollar amount" must be recovered and the Monthly WNA_i

² Lena Mantle's rebuttal testimony pages 3, line 15 through page 5, line 15.

³ Lena Mantle's rebuttal testimony pages 5, line 18 through page 7, line 10.

⁴ Lena Mantle's rebuttal testimony pages 7, lines 19 through page 9, line 22.

⁵ GT-2025-0082. Commission approved on October 17, 2024. Effective date November 1, 2024.

1 is calculated. Staff opposes all change recommendations as established in Mrs. Mantle's
2 Schedule LMM-R-3. These changes have the very real potential to incorrectly impact WNAR
3 calculations and do not add any benefit to WNAR calculations or provide additional clarity.

4 Q. What are the change recommendations from Mrs. Mantle that Staff contests
5 specific to Ameren Missouri's effective tariff sheet no. 32.2?

6 A. Mrs. Mantle's recommendations include changes to the existing applicability
7 statement as well as a revision to the Calculation of Current Weather Adjustment Rate,
8 which is referred to as 'WAR'.

9 Q. Are there any other items in Mrs. Mantle's rebuttal testimony that Staff contest?

10 A. Yes. Staff disagrees with Mrs. Mantle's claim the WNAR rate of \$0.0712/Ccf
11 is above the WNAR rate cap of \$0.05/Ccf. Mrs. Mantle's understanding
12 of the \$0.05/Ccf is incorrect.

13 Q. Why does Staff disagree with Mrs. Mantle understanding
14 of the \$0.05/Ccf cap limit?

15 A. As established in Ameren Missouri's effective tariff sheet no. 32.1⁶ a limit of
16 \$0.05/Ccf on upward *adjustment* is specific to the Weather Adjustment ("WA"). The WA is a
17 portion of the calculation for the Weather Adjustment Rate for Residential Customers⁷ ("WR").
18 The WA is an adjustment amount, which is prohibited to increase more than \$0.05/Ccf.
19 Applying the WA \$0.05/Ccf cap in addition to the WR is incorrect. In the most recent WNAR
20 filing for Ameren Missouri, the net change (i.e., WA) was \$0.0232/Ccf⁸ resulting in an increase
21 from the previous WR of \$0.048/Ccf to the current Commission approved WR of \$0.0712/Ccf.

⁶ Ameren Missouri tariff P.S.C. Mo No. 2, Sheet No. 32.1, effective 2/28/2022.

⁷ Ameren Missouri tariff P.S.C. Mo No. 2, Sheet No. 32.2, effective 11/01/2024.

⁸ GT-2025-0082 Staff Recommendation for Approval of Tariff Sheet to Adjust Ameren's Weather Normalization Adjustment Rider Rate, Appendix A, page 2 of 2.

1 Q. What is Staff's recommendation to the Commission?

2 A. Staff recommends that the proposed changes as established by
3 Ameren Missouri's witness Mr. Michael Harding direct testimony, Schedule MHW-D-3⁹ be
4 approved. Additionally, Staff recommends that Ameren Missouri's current effective tariff sheet
5 no. 32.2 remain unchanged.

6 Q. Does this conclude your surrebuttal/true-up direct testimony?

7 A. Yes, it does.

⁹ Sheet nos. 32 and 32.1.

OF THE STATE OF MISSOURI

AFFIDAVIT OF MICHAEL J. ABBOTT

D. Sullivan
Notary Public

Michael J. Abbott

I serve as the Senior Project Manager Regulatory for the Water, Sewer, Gas, & Steam Department, in the Industry Analysis Division of the Missouri Public Service Commission. I have been employed by the State of Missouri for 19 years, and have been with the Commission just over 1 year. My duties as Senior Project Manager involve all aspects of the Commission's regulation of the water, sewer, gas, and steam industries including customer complaints, drafting and reviewing testimony, drafting rules policy, and working with the utilities to promote best practices in their provision of safe and adequate service at just and reasonable rates.

Educational Background and Work Experience

I have a Bachelor of Science degree in Environmental Science from Southeast Missouri State University. Prior to joining the Public Service Commission, I was employed by the Missouri Department of Natural Resources from 2004-2024, as an Environmental Specialist, Environmental Scientist, Unit Chief, and Section Manager. During my time with the Department of Natural Resources I worked in compliance and enforcement, industrial and domestic wastewater permitting, data management unit chief, municipal separate storm sewer system scientist, and eventually oversaw a staff of 26 Missouri State Operating Permit writers and administrative support as manager of the Water Pollution Control Branch's Operating Permit Section. I have served as expert witness before the Administrative Hearing Commission, as well as expert witness in State enforcement cases.

Previous Testimony Before the Public Service Commission

Case Number	Company	Type of Testimony	Issue
WR-2024-0104	Liberty Utilities	Direct	Resource Planning
WR-2024-0320	Missouri-American Water Company	Direct / Rebuttal	Resource Planning, Revenue Stabilization Mechanism
GR-2025-0107	Spire Missouri	Direct	2022 Stipulation and Agreement, Decoupling Rate Mechanisms