

*Exhibit No.:*

*Issue(s):* Customer Deposits, Customer  
Advances, Prepayments,  
Material & Supplies  
excluding Fuel Inventory

*Witness:* Sydney Ferguson

*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**

## **FINANCIAL & BUSINESS ANALYSIS DIVISION**

### **AUDITING DEPARTMENT**

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

**OF**

**SYDNEY FERGUSON**

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

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

*Jefferson City, Missouri  
May 2025*

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**SYDNEY FERGUSON**  
**UNION ELECTRIC COMPANY,**  
**d/b/a Ameren Missouri**  
**CASE NO. GR-2024-0369**

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

2                                   **OF**

3                                   **SYDNEY FERGUSON**

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 Sydney Ferguson and my business address is 615 East 13<sup>th</sup> Street,  
9                   Kansas City, MO 64106.

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

11                  A.     I am employed by the Missouri Public Service Commission (“Commission” or  
12                  “PSC”) as a Utility Regulatory Auditor.

13                  Q     Are you the same Sydney Ferguson who filed Direct Testimony on February 28,  
14                  2025, in this case?

15                  A.     Yes, I am.

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

17                  A.     My surrebuttal/true-up direct testimony will respond to the rebuttal testimony of  
18                  Ameren Missouri witness Benjamin Hasse on the topic of American Gas Association (AGA)  
19                  prepaid memberships. This testimony will also provide Staff’s positions regarding the amounts  
20                  to be included in the cost of service for customer advances, customer deposits, interest on  
21                  customer deposits, prepayments, and materials & supplies based upon its true-up audit.  
22                  Fuel inventory is addressed in the true-up direct testimony of Staff witness Jared Giacone<sup>1</sup>.

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<sup>1</sup> Giacone Surrebuttal/True-Up Direct, Pages 1-2.

**PREPAYMENTS - MEMBERSHIP DUES**

Q. On page 14, lines 10-21 of Ameren Missouri witness Benjamin Hasse's rebuttal testimony, he discusses his disagreement with Staff's position to remove gas membership dues from prepayments within rate base. What is the basis for Mr. Hasse's disagreement?

A. Ameren Missouri witness Hasse states that Ameren Missouri has a number of membership dues that are required to be prepaid by the member organization and that the AGA membership dues are an example of this for gas operations. These costs are billed at the beginning of the membership period and are prepaid for the year and the cost is amortized over the period much like insurance. Mr. Hasse states that this membership should be included in rate base as a prepayment because this membership is required to be prepaid and is beneficial to Ameren Missouri and its customers.

Q. Did Staff include an annual amount of membership dues in the cost of service?

A. Yes. Staff witness Blair Hardin included an annual level of expense for the non-lobbying related portion of AGA dues in expense in the cost of service.

Q. Why did Staff remove the amount of prepaid AGA membership dues from rate base?

A. After reviewing the invoices related to AGA membership dues, Staff found that Ameren Missouri is not required to prepay the AGA membership dues, but rather there are multiple options for paying this membership. A copy of the most recent AGA invoice for 2024 is attached as Confidential Schedule SF-s1. This shows that Mr. Hasse's statement that prepayment is required is false. Since prepayment is not a requirement, Staff does not believe that customers should pay an additional amount in the cost of service for Ameren Missouri to receive a return on the prepaid membership amount. If Ameren Missouri is allowed to prepay

1 this membership due, this will be considered a prepaid asset and will be included in rate base  
2 to allow a return on the unused portion of the prepaid asset.

3 **TRUE-UP DIRECT**

4 **Customer Deposits**

5 Q. Has Staff updated its position on customer deposits?

6 A. Yes. Staff updated its position to include the most current level of customer  
7 deposits using a 13-month average ending December 31, 2024.

8 Q. Has Staff updated its position on customer deposits interest expense?

9 A. Yes. Staff updated its position on customer deposits interest expense using the  
10 updated 13 month average ending December 31, 2024, and the prime interest rate of 9.50%.

11 **Customer Advances**

12 Q. Did Staff update its position for customer advances?

13 A. Yes. Staff updated its position to include the most current level of customer  
14 advances using a 13-month average ending December 31, 2024.

15 **Prepayments**

16 Q. Has Staff updated its position on prepayments?

17 A. Yes. Staff has included amounts using a 13-month average through  
18 December 31, 2024, excluding the only prepaid membership due for gas operations, AGA.

19 **Materials and Supplies**

20 Q. Has Staff updated its position on materials and supplies?

21 A. Yes. Staff updated its position to include a 13-month average from Ameren  
22 Missouri monthly reports, A9, A11, and the general ledger through December 31, 2024.

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

24 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 SYDNEY FERGUSON**

STATE OF MISSOURI                                )  
  )  
COUNTY OF Jackson                                )       ss.

COMES NOW SYDNEY FERGUSON and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / True-Up Direct Testimony of Sydney Ferguson*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
SYDNEY FERGUSON

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 28th day of April 2025.

  
\_\_\_\_\_  
Notary Public

B. L. STIGGER  
NOTARY PUBLIC - NOTARY SEAL  
STATE OF MISSOURI  
MY COMMISSION EXPIRES JANUARY 2, 2028  
JACKSON COUNTY  
COMMISSION #24332661

**Case No. GR-2024-0369**

**SCHEDULE SF-s1**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**