

Exhibit No.:

Issue(s):

Rate Case Expense

Witness/Type of Exhibit: Robertson/True-Up Direct

Sponsoring Party:

Public Counsel

Case No.:

ER-2012-0166

TRUE-UP DIRECT TESTIMONY

OF

TED ROBERTSON

Submitted on Behalf of the Office of the Public Counsel

**UNION ELECTRIC COMPANY D/B/A
AMEREN MISSOURI**

CASE NO. ER-2012-0166

**

**

Denotes Highly Confidential Information that has been redacted

October 18, 2012

NP

**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 Increase)
Its Revenues for Electric Service)

File No. ER-2012-0166

AFFIDAVIT OF TED ROBERTSON

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Ted Robertson, of lawful age and being first duly sworn, deposes and states:

1. My name is Ted Robertson. I am a Chief Public Utility Accountant for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my true-up direct 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.




Ted Robertson, C.P.A.
Chief Public Utility Accountant

Subscribed and sworn to me this 18th day of October 2012.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2013
Cole County
Commission #09754037



Jerene A. Buckman
Notary Public

My Commission expires August, 2013.

**TRUE-UP DIRECT TESTIMONY
OF
TED ROBERTSON**

**UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI
CASE NO. ER-2012-0166**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Ted Robertson, P. O. Box 2230, Jefferson City, Missouri 65102.

Q. ARE YOU THE SAME TED ROBERTSON THAT HAS PREVIOUSLY FILED
DIRECT, REBUTTAL AND SURREBUTTAL TESTIMONY IN THIS CASE?

A. Yes.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TRUE-UP DIRECT TESTIMONY?

A. The purpose of this True-Up Direct Testimony is to update the Commission on the
amount of rate case expense incurred by Company through the end of the true-up period,
July 31, 2012.

III. RATE CASE EXPENSE

Q. WHAT IS THE AMOUNT OF RATE CASE EXPENSE COMPANY HAS INCURRED TO-DATE?

A. The most recent response to MPSC Staff Data Request No. 173 (updated as of August 29, 2012) states that the Company has received invoices for actual costs totaling **

**. The costs consist of ** to Smith Lewis, LLP and ** to Brydon, Swearngen & England P. C. as outside legal, ** to Concentric Energy Advisors for return on equity, lead/lag/revenue requirement and policy experts, ** to various outside support services and ** for travel expenses.

Q. IS IT PUBLIC COUNSEL'S RECOMMENDATION THAT THE COSTS ASSOCIATED WITH THE OUTSIDE LEGAL SERVICES PROVIDED BY SMITH LEWIS, LLP, BRYDON, SWEARENGEN & ENGLAND P. C., BRATTLE GROUP INC. AND COMMUNICATION COUNSEL OF AMERICA INC. BE EXCLUDED FROM THE RATE CASE EXPENSE AMOUNT AUTHORIZED IN THE INSTANT CASE?

A. Yes.

1 Q. IS IT PUBLIC COUNSEL'S RECOMMENDATION THAT THE COSTS
2 ASSOCIATED WITH THE OUTSIDE CONSULTANT SERVICES PROVIDED BY
3 CONCENTRIC INC. BE EXCLUDED FROM THE RATE CASE EXPENSE AMOUNT
4 AUTHORIZED IN THE INSTANT CASE?

5 A. Yes.

6
7 Q. WHAT IS THE AMOUNT OF RATE CASE EXPENSE PUBLIC COUNSEL
8 RECOMMENDS SHOULD BE INCLUDED IN THE COST OF SERVICE
9 DETERMINATION?

10 A. Public Counsel recommends that 50% of the remaining costs, i.e., \$2,327, be authorized
11 for recovery from ratepayers on the normalized basis I recommended in my Direct
12 Testimony.

13
14 Q. ARE THERE ANY OTHER CONCERNS OPC HAS WITH THIS ISSUE?

15 A. Yes. The Company's most recent update for the costs incurred only includes invoices
16 through February of 2012 for the outside consultants and most of the outside legal
17 services. This is highly unusual given the current status of the rate case. In all the years
18 that I have worked in the regulatory process I have never witnessed such a late
19 accumulation of the costs for this issue. I do not know why the utility has not updated its
20 costs through the end of the true-up period or the most current date, but I believe it highly

1 likely that additional costs have been incurred and not supported in the documentation
2 provided to Public Counsel or other intervenors. However, given that the Company has
3 not met its burden to support the costs, Public Counsel has no choice but to rely on the
4 supporting documentation that has been provided in order to base its recommendation to
5 the Commission.

6
7 Q. DOES THIS CONCLUDE YOUR TRUE-UP DIRECT TESTIMONY?

8 A. Yes.
9