

EXHIBIT

Exhibit No.:

301

Issue(s):

Weather

Witness/Type of Exhibit:

Mantle/Rebuttal

Sponsoring Party:

Public Counsel

Case No.:

GO-2019-0058

GO-2019-0059

FILED
January 22, 2019
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Service Commission

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

**SPIRE MISSOURI, INC.
D/B/A SPIRE**

CASE NO. GO-2019-0058

CASE NO. GO-2019-0059

December 20, 2018

OPC Exhibit No. 301
Date 1-15-19 Reporter Bjt
File No. GO-2019-0058
GO-2019-0059

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Spire Missouri, Inc.)
d/b/a Spire's Request to Decrease)
WNAR) Case No. GO-2019-0058

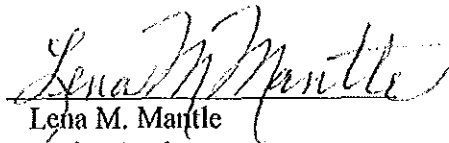
In the Matter of Spire Missouri, Inc.'s)
d/b/a Spire's Request to Increase Its)
WNAR) Case No. GO-2019-059

AFFIDAVIT OF LENA MANTLE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Lena Mantle, of lawful age and being first duly sworn, deposes and states:


1. My name is Lena 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.


Lena M. Mantle
Senior Analyst

Subscribed and sworn to me this 20th day of December 2018.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2021
Cole County
Commission #13764037


Jerene A. Buckman
Notary Public

My Commission expires August 23, 2021.

REBUTTAL TESTIMONY

OF

LENA M. MANTLE

SPIRE MISSOURI, INC.

CASE NOS. GO-2019-0058 & GO-2019-0059

1 **Q. Would you please state your name and business address?**

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

5 **Q. Are you the same Lena M. Mantle that filed direct testimony in this case?**

6 A. Yes, I am.

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

8 A. The purpose of my rebuttal testimony is to respond to the direct testimony of Spire
9 Missouri Inc. (“Spire”) witness Scott A. Weitzel regarding the tariff sheet
10 language and the consistency of the Weather Normalization Adjustment Riders
11 (“WNAR”) with other adjustment mechanisms.

12 **Q. What is the position of OPC regarding the WNAR rates proposed by Spire?**

13 A. OPC’s position is consistent with the Commission Staff’s (“Staff”)
14 recommendations as provided in Staff witness Michael L. Stahlman’s direct
15 testimony.¹ OPC recommends the Commission:

- 16 1) Reject the WNAR rates for both Spire Missouri East and Spire Missouri
17 West divisions; and
18 2) Order Spire to use Staff’s ranked method for calculating the WNAR in
19 these cases and in future WNAR filings.

¹ Page 1 line 15 – page 2 line 1.

1 **Q. Spire witness Weitzel states that there is nothing in the WNAR tariff sheets**
2 **that references or endorses the use of Staff’s ranking methodology.² Do you**
3 **agree with Mr. Weitzel?**

4 A. Yes. I could find no reference in the tariff sheets regarding how normal weather
5 should be calculated.

6 **Q. Then why should the Commission adopt the Staff’s ranking methodology?**

7 A. The Commission should adopt the Staff’s ranking methodology because it is the
8 most accurate representation of normal weather.

9 **Q. Is this the method Staff always uses in rate cases to normalize weather?**

10 A. Yes. Staff has used this method to determine daily weather normal variables in
11 gas and electric rate cases since the early-1990s when Staff developed the
12 methodology to reflect the typical Missouri day-to-day fluctuations of
13 temperatures in normal weather variables in a manner that preserved the National
14 Oceanic and Atmospheric Administration (“NOAA”) normal weather measures.

15 **Q. Are you aware of any cases in which normal weather variables calculated**
16 **using the ranking methodology were not accepted by other parties in the**
17 **case?**

18 A. While there may have been some cases soon after the methodology was developed
19 where there was some disagreements among the parties as to the correct
20 methodology to use to determine normal weather, I am not aware of any case in
21 the last fifteen years, either electric or gas, in which the weather normalization of
22 usage agreed to by the parties did not use normal weather calculated using Staff’s
23 methodology.

² Page 5 lines 7 – 9.

1 **Q. Why is the Staff's ranking methodology a more accurate representation of**
2 **normal weather than the daily HDDs used in the rate case?**

3 A. As provided in Staff witness Stahlman's direct testimony,³ if the normal weather
4 is not assigned to days as provided in Staff's methodology, adjustments would be
5 made to usage in a month for which the actual monthly heating degree days
6 ("HDD") were the same the normal monthly heating degree days resulting in a
7 "normalization adjustment" for a month with normal weather.

8 **Q. In his Direct testimony Mr. Weitzel claims that Staff's ranking method was**
9 **not "litigated in the rate cases in which the WNAR was approved."⁴ Is this a**
10 **reason to not use Staff's ranking methodology?**

11 A. No. This statement is misleading because the ranked normal HDD calculated
12 using Staff's methodology was used, with no objection, in the last rate case in
13 which the Commission approved this WNAR. Consistency in methodology will
14 result in greater accuracy in the WNAR rate adjustment.

15 **Q. What is your response to Mr. Weitzel's argument that using Staff's ranking**
16 **methodology would be inconsistent with other adjustment mechanisms?⁵**

17 A. Each adjustment mechanism has unique characteristics and how the adjustments
18 to these mechanisms are calculated have evolved over time. This is the very first
19 WNAR rate adjustment. This case is the appropriate time to determine how the
20 adjustment should be calculated. OPC agrees with Staff that the appropriate
21 methodology to determine normal weather is the Staff's ranking methodology and
22 recommends the Commission adopt this methodology in this case and order Spire
23 to use the ranking methodology in its future WNAR rate adjustment cases.
24

³ Page 3 line 4 – Page 4 line 10.

⁴ Page 5 lines 15 – 17.

⁵ Weitzel Direct, page 8 line 12 – page 10 line 12.

1 | **Q. Does this conclude your direct testimony?**

2 | A. Yes, it does.