

# Exhibit No. 101

*Exhibit No.:*  
*Issue(s):* *Transportation Tariffs*  
*Witness:* *Keenan B. Patterson*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Surrebuttal Testimony*  
*Case No.:* *GR-2021-0320*  
*Date Testimony Prepared:* *April 11, 2022*

**MISSOURI PUBLIC SERVICE COMMISSION**  
**FINANCIAL AND BUSINESS ANALYSIS DIVISION**  
**PROCUREMENT ANALYSIS DEPARTMENT**

**SURREBUTTAL TESTIMONY**

**OF**

**KEENAN B. PATTERSON, PE**

**THE EMPIRE DISTRICT GAS COMPANY,  
d/b/a Liberty (Empire)**

**CASE NO. GR-2021-0320**

*Jefferson City, Missouri*  
*April 2022*

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**SURREBUTTAL TESTIMONY OF**  
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**THE EMPIRE DISTRICT GAS COMPANY,**  
**d/b/a Liberty (Empire)**  
**CASE NO. GR-2021-0320**

EXECUTIVE SUMMARY .....1

TELEMETRY .....1



1 customer (*sic*) which are over 40,000 CCfs are required to have telemetry regardless if they are  
2 schools or other entities.”<sup>1</sup>

3 Q. What is the correct information?

4 A. If the transportation customer is a school participating in the school aggregation  
5 program established in Section 393.310 RSMo, telemetry is only required if the annual gas  
6 consumption is greater than 100,000 Ccf (a Ccf is 100 standard cubic feet). This is specified in  
7 Empire’s proposed tariff:

8 4. Metering Requirements: All transportation Customers, with the  
9 exception of individual schools participating pursuant to Section  
10 393.310 RSMO, and those customers taking service under transportation  
11 rate schedule MGST currently being served by the Company, are  
12 required to install telemetry at the Customer Facility. Individual schools  
13 participating pursuant to Section 393.310 RSMO with annual gas  
14 consumption greater than 100,000 Ccf are required to install telemetry.<sup>2</sup>

15 Q. Is this requirement the same as the current Empire tariff?

16 A. Yes. The requirements related to telemetry for school transportation customers  
17 is unchanged from the current tariff.

18 Q. Has Empire required any schools that receive transportation service from it to  
19 install telemetry?

20 A. No. All individual schools that receive transportation service from Empire have  
21 an annual consumption of less than 40,000 Ccf.<sup>3</sup> Because all have an annual consumption of  
22 less than 100,000 Ccf, all are exempt from the telemetry requirement.

23 Q. Does this conclude your surrebuttal testimony?

24 A. Yes it does.

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<sup>1</sup> Earhart rebuttal, pg. 6, ll. 6-8.

<sup>2</sup> Empire’s Tariff Revision (YG-2002-0040) (EFIS Item No 35), Sheet No 28.

<sup>3</sup> Empire’s response to Staff Data Request No. 236.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of The Empire District Gas.                    )  
Company's d/b/a Liberty Request to File Tariffs        )        Case No. GR-2021-0320  
to Change its Rates for Natural Gas Service            )

**AFFIDAVIT OF KEENAN B. PATTERSON, PE**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE        )

COMES NOW KEENAN B. PATTERSON, PE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Keenan B. Patterson, PE*; and that the same is true and correct according to his best knowledge and belief.

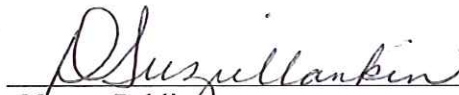
Further the Affiant sayeth not.

  
\_\_\_\_\_  
KEENAN B. PATTERSON, PE

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8<sup>th</sup> day of April 2022.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
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Notary Public