BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Service Commission Case No. GR-99-315

In the Matter of Laclede Gas Company's) Tariff to Revise Natural Gas Rate) Schedules.

AFFIDAVIT

STATE OF MISSOURI)) SS. CITY OF ST. LOUIS)

Susan M. Kopp, of lawful age, being first duly sworn, deposes and states:

1. My name is Susan M. Kopp. My business address is 720 Olive Street, St. Louis, Missouri 63101; and I am Assistant to the Manager of Rate and Financial Planning for Laclede Gas Company.

2. Attached hereto and made a part hereof for all purposes is my direct testimony, consisting of pages 1 to 7, inclusive; and Section C - Schedules 13 and 16.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded and the information contained in the attached schedules are true and correct to the best of my knowledge and belief.

Ausan M

Subscribed and sworn to before me this 10^{Th} day of March, 1999.

PATRICIA P. HICKS Notary Public — Notary Seal STATE OF MISSOURI City of St. Louis My Commission Expires: June 27, 2002

Patricia P. Hicks

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Exhibit No.: Issue: Witness: Type of Exhibit: Sponsoring Party: Case No.:

Accounting Schedules Susan M. Kopp Direct Testimony Laclede Gas Company GR-99-315

FILED MAR 1 1 1999 Service Commission

LACLEDE GAS COMPANY

GR-99-315

DIRECT TESTIMONY

OF

SUSAN M. KOPP



Direct Testimony of Susan M. Kopp

Table of Contents

Issue

<u>Page</u>

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General Information/Qualifications	1
Purpose of Testimony	2
Postage and Other Mailing Costs	3
Benefit Plan Trustee Fees and 401(k) Expenses	3
Rate Case Expense	4
Dues and Fees	4

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DIRECT TESTIMONY OF SUSAN M. KOPP

1	Q.	Please state your name and business address.
2	A.	My name is Susan M. Kopp and my business address is
3		720 Olive St., St. Louis, Missouri 63101.
4	Q.	What is your present position?
5	Α.	I am Assistant to the Manager of Rate and Financial
6		Planning for Laclede Gas Company.
7	Q.	Please state how long you have held your position and
8		briefly describe your responsibilities.
9	A.	I was appointed to my present position in January,
10		1999. In this position, I assist in the preparation
11		of various financial analyses and studies pertaining
12		to rate matters generally. I also assist in the
13		preparation of various forecasts and monitor regulato-
14		ry trends and developments.
15	Q.	What is your educational background?
16	Α.	I graduated from the University of Missouri - St.
17		Louis in 1991, with a Bachelor of Science degree in
18		Business Administration, majoring in accounting.
19	Q.	Have you passed the Uniform CPA exam?
20	A.	Yes, I passed the Uniform CPA exam in 1992.
21	Q.	Will you briefly describe your experience with the
22		Company prior to becoming Assistant to the Manager of
23		Rate and Financial Planning?

1 Α. I joined Laclede in January, 1992, as a Staff Auditor 2 in the Internal Audit Department. I was promoted to 3 Auditor in January, 1994 and appointed Assistant to 4 the Information Systems Auditor in July, 1994. In October, 1995, I was transferred to the Financial 5 6 Planning Department where I served as an Analyst. In 7 January, 1997, I was promoted to Senior Analyst, and 8 acted in that capacity until being promoted to my 9 present position. 10 Q. Are you a member of any professional societies? 11 Yes, I am a member of the Missouri Society of Certi-Α. fied Public Accountants. 12 13 Have you previously filed testimony before this Com-0. 14 mission? 15 Α. No, I have not. 16 Purpose of Testimony 17 Q. What is the purpose of your testimony? 18 Α. I am sponsoring income statement adjustments related 19 to several expense categories. 20 Please list the schedules you are sponsoring. 0. I am sponsoring the following schedules which were 21 Α. 22 prepared by me or under my supervision: Section C, 23 TEST YEAR UTILITY OPERATING INCOME AND ADJUSTMENTS, 24 Schedules 13 and 16, which provide supporting detail 25 for certain of my adjustments to test year operating 26 income.

- Q. Please summarize the adjustments to utility operating
 expenses that you are sponsoring that appear on
 Schedule 2 of Section C.
- A. I am sponsoring adjustments to postage and other
 mailing costs, trustee fees and 401(k) expenses, rate
 case expense, and elimination of dues and other expenses.

Postage and Other Mailing Costs

9 Q. Please explain your adjustment for postage and other10 mailing costs.

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11 Adjustment 3.d., also detailed on Schedule 13, ad-Α. 12 justs customer accounts expense for increased postage 13 and card stock expenses directly related to the 14 growth in customer levels discussed in Company wit-15 ness P. A. Krieger's testimony. It also includes an adjustment to reflect the postage rate increase effec-16 17 tive in January, 1999. This adjustment brings all 18 test year mailings to these new rate levels.

Benefit Plan Trustee Fees and 401(k) Expenses
Q. Please continue your explanation of the adjustments
you are sponsoring.

A. Adjustment 4.d., detailed on Schedule 16 of
Section C, reflects increased trustee fees based on
the increased value of the projected plan assets
managed by the trustee at March 31, 1999.
Q. What adjustment have you made to 401(k) expenses?

A. Company contributions to 401(k) Wage and Salary Deferral Savings Plans have been normalized to reflect:

1		(1) the adjusted wage and salary levels sponsored by
2		Company witness J. A. Fallert; and (2) the 1/2
3		percent increase in the Company matching contribution
4		levels, effective August 1998 for Laclede Division
5		Contract employees and April 1999 for Missouri
6		Natural Division Contract employees.
7		Rate Case Expense
8	Q.	Please explain your next adjustment relating to rate
9		case expense.
10	Α.	Adjustment 4.j. adjusts test year expense to reflect
11		anticipated levels of out-of-pocket costs to be in-
1 2		curred by Laclede in connection with this proceeding.
13		Dues and Fees
14	Q.	Please discuss your adjustment relating to club mem-
15		berships.
16	Α.	Adjustment 4.1., transfers to "below-the-line" dues
17		and fees related to club memberships.
18	Q.	Does the Company also sponsor corporate or individual
19		memberships in business, professional, economic/civic
20		and other industry organizations?
21	Α.	Yes. The Company pays for memberships in these types
22		of organizations.
23	Q.	Has the Company included the cost of these types of
24		memberships in its cost of service in this proceeding?
25	Α.	Yes. The Company believes these membership costs
26		have been prudently incurred and represent ordinary
27		and necessary expenses associated with the operation
28		of its utility business. Memberships in these organ-

1 izations are common to all business enterprises. As 2 a public service company, Laclede and its customers 3 benefit from participation in these types of 4 organizations. Accordingly, such costs should be included in cost of service for ratemaking purposes. 5 6 Q. How do customers benefit from the Company's participa-7 tion in these organizations?

8 Α. Customers benefit from the Company's membership in 9 these organizations because they provide a forum 10 through which the Company can: 1) participate in fos-11 tering a favorable business and economic climate in 12 its service area, thereby allowing it to identify and 13 help attract new customers to its service area or, 14 conversely, retain customers in its service area, 15 which in turn allows the Company to spread its fixed 16 costs over a larger customer group resulting in a 17 lower cost per customer; 2) aid in the research and 18 development of new gas technology and more energy 19 efficient appliances, as well as identification and 20 development of potential new markets for natural gas; 21 3) access educational, developmental, and technical 22 training materials generally at little or no cost; 4) 23 assist its professional employees (e.g. accountants, 24 lawyers, engineers, human resource managers, safety 25 and health professionals) to maintain and expand their levels of knowledge in their respective fields, 26 27 which benefits customers through enhanced employee 28 service to the Company; and 5) realize cost savings

1 and efficiencies, enhanced productivity, safety im-2 provements and technical assistance through the 3 exchange of ideas with other members. Do any of these organizations share similar agendas? 4 Q. 5 Some of these organizations appear to share similar Α. 6 agendas; however, the difference is in the areas 7 served and the types of projects undertaken. 8 Q. Is it possible to quantify, in dollars, the amount of 9 these benefits to customers? It is difficult, if not impossible, to quantify in 10 Α. 11 dollars all of the direct and indirect benefits received by customers as a result of the Company's 12 13 participation in these organizations. However, just 14 as customers benefit from the participation of Commis-15 sion personnel in various professional and regulatory associations, it is clear that the customer benefits 16 17 from Laclede's membership in these organizations in 18 that it results in a more efficient operation of the 19 Company by more knowledgeable and informed employees. 20 Q. Do you have any additional comments you wish to add 21 regarding Company sponsored corporate or individual memberships in business, professional, economic/civic 22 and industry organizations? 23

A. Yes. It is important to note that even during years
of disappointing financial results, the Company has
continued its membership in these organizations. Our
role in these organizations goes beyond the payment
of dues. For example, particularly at the executive

level, extensive participation in many of these organ izations provides the leadership to foster a
 favorable economic climate in the St. Louis area.
 Q. Does this conclude your testimony?
 A. Yes, it does.

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