Exhibit No.:

Issue(s): "Budget" Infrastructure Costs/

Telemetric Equipment/

Regulator Stations

Witness/Type of Exhibit: Moore/Direct Sponsoring Party: Public Counsel GO-2015-0341

DIRECT TESTIMONY

OF

JACQUELINE MOORE

Submitted on Behalf of the Office of the Public Counsel

LACLEDE GAS COMPANY

CASE NO. GO-2015-0341

October 2, 2015

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)	
Laclede Gas Company to Change its)	G N GO 604 - 604
Infrastructure System Replacement	í	Case No. GO-2015-0341
Surcharge in its Laclede Gas Service)	
Territory.)	

AFFIDAVIT OF JACQUELINE MOORE

STATE OF MISSOURI)	
)	SS
COUNTY OF COLE)	

Jacqueline Moore, of lawful age and being first duly sworn, deposes and states:

- 1. My name is Jacqueline Moore. I am a Public Utility Accountant I for the Office of the Public Counsel.
 - 2. Attached hereto and made a part hereof for all purposes is my 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.

Jacqueline Moore

Public Utility Accountant I

Subscribed and sworn to me this 2nd day of October 2015.

NOTARY C SEAL S

JERENE A. BUCKMAN My Commission Expires August 23, 2017 Cole County Commission #13754037

Jerene A. Buckman Notary Public

My Commission expires August 23, 2017.

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DIRECT TESTIMONY 2 OF **JACQUELINE MOORE** 3 4 LACLEDE GAS COMPANY 5 CASE NO. GO-2015-0341 6 7 8 9 I. **INTRODUCTION** 10 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS. 11 Jacqueline Moore, P.O. Box 2230, Jefferson City, Missouri 65102-2230. A. 12 13 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY? 14 A. I am employed by the Missouri Office of the Public Counsel ("OPC" or "Public 15 Counsel") as a Public Utility Accountant I. 16 17 WHAT IS THE NATURE OF YOUR CURRENT DUTIES AT THE OPC? Q. 18 My duties include performing audits and examinations of the books and records of A. 19 public utilities operating within the state of Missouri. 20 21 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND OTHER 22 QUALIFICATIONS.

Direct Testimony of Jacqueline Moore Case Nos. GO-2015-0341 and GO-2015-0343

1	A.	I graduated in May 2015, from william woods University, in Futton, Missouri, with a
2		Bachelor of Science Degree in Accounting.
3		
4	Q.	HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI
5		PUBLIC SERVICE COMMISSION ("COMMISSION")?
6	A.	No.
7		
8	Q.	WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?
9	A.	The purpose of my direct testimony is to provide the Commission with facts relevant to
10		Laclede Gas Company's ("Laclede" or "Company") and Missouri Gas Energy's
11		("MGE") petitions to change their respective Infrastructure System Replacement
12		Surcharges ("ISRS").
13		
14	II.	"BUDGET" INFRASTRUCTURE COSTS
15	Q.	HAVE LACLEDE AND MGE INCLUDED "BUDGET" COSTS IN THEIR INITIAL
16		APPLICATIONS FILED ON AUGUST 3, 2015?
17	A.	Yes. "Budget" costs were included for July 2015 and August 2015. A "budget" cost is
18		described by Laclede and MGE as a pro-forma cost that is later followed by
19		reconciliation.
20		
I	I	

1	Q.	WHAT ARE THE AMOUNTS OF "BUDGET" COSTS LACLEDE AND MGE
2		INCLUDED FOR JULY 2015?
3	A.	As shown in Laclede's initial application filing, Laclede included "budget" costs totaling
4		\$8,113,000 for July 2015.
5		As shown in MGE's initial application filing, MGE included "budget" costs of
6		\$1,912,710.66 for July 2015.
7		
8	Q.	WHAT ARE THE AMOUNTS OF "BUDGET" COSTS LACLEDE AND MGE
9		INCLUDED FOR AUGUST 2015?
10	A.	As shown in Laclede's initial application filing, Laclede included "budget" costs totaling
11		\$8,611,000 for August 2015.
12		As shown in MGE's initial application filing, MGE included "budget" costs of
13		\$5,211,188.47 for August 2015.
14		
15	Q.	WHAT ARE THE TOTAL AMOUNTS LACLEDE AND MGE CLAIM ARE ISRS-
16		ELIGIBLE IN THEIR INITIAL APPLICATION FILINGS?
17	A.	Laclede calculates ISRS plant to total \$42,501,163.70.
18		MGE calculates ISRS plant to total \$15,099,280.74.
19		

1	Q.	WHAT ARE THE TOTAL CLAIMED ISRS COSTS ACTUALLY INCURRED FOR
2		JULY AND AUGUST 2015, AS SHOWN IN LACLEDE AND MGE'S
3		SUPPLEMENTAL WORKPAPERS PROVIDED TO PUBLIC COUNSEL AFTER
4		THE INITIAL APPLICATION FILING?
5	A.	As shown in Schedule JSM-1, Laclede calculates ISRS actually incurred for July 2015 to
6		total \$2,132,095.23 and \$15,855,346.44 for August 2015. Together, July 2015 and
7		August 2015 total \$17,987,441.67.
8		As shown in Schedule JSM-1, MGE calculates ISRS actually incurred for July 2015 to
9		total \$5,729,647.79 and \$3,897,099.37 for August 2015. Together, July 2015 and
10		August 2015 total \$9,626,747.16.
11		
11 12	Q.	ARE THE ACTUAL INFRASTRUCTURE COSTS INCURRED HIGHER THAN THE
	Q.	ARE THE ACTUAL INFRASTRUCTURE COSTS INCURRED HIGHER THAN THE "BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL
12	Q.	
12 13	Q.	"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL
12 13 14		"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL APPLICATIONS?
12 13 14 15		"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL APPLICATIONS? Yes. The actual infrastructure costs Laclede incurred, for July 2015 and August 2015, is
12 13 14 15 16		"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL APPLICATIONS? Yes. The actual infrastructure costs Laclede incurred, for July 2015 and August 2015, is \$1,263,441.67 higher than the "budget" amount of \$16,724,000 Laclede included in its
12 13 14 15 16 17		"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL APPLICATIONS? Yes. The actual infrastructure costs Laclede incurred, for July 2015 and August 2015, is \$1,263,441.67 higher than the "budget" amount of \$16,724,000 Laclede included in its initial filing.
12 13 14 15 16 17		"BUDGET" AMOUNTS LACLEDE AND MGE INCLUDED IN THEIR INITIAL APPLICATIONS? Yes. The actual infrastructure costs Laclede incurred, for July 2015 and August 2015, is \$1,263,441.67 higher than the "budget" amount of \$16,724,000 Laclede included in its initial filing. The actual infrastructure costs MGE incurred, for July 2015 and August 2015, is

20

Laclede decided to replace the telemetric equipment because the "old telemetric

REGULATOR STATIONS?

20

Direct Testimony of Jacqueline Moore Case Nos. GO-2015-0341 and GO-2015-0343

1	Α.	Work Order 003304 describes and justifies the replacement as follows:
2		"WO Description: Install a new SF to IP telemetric below grade
2 3		regulator station to replace existing station #519 near the
4 5		intersection of Osceola & Virginia. The new station is designed to feed the new IP Distribution system for the City of St. Louis."
6		to reed the Will Bistinguish system for the City of Sti Zouish
7		"Reason for Work (Justification): The new SF-IP telemetric
8		regulator station is necessary to support the new IP distribution
9		system for the City of St. Louis."
10		
11		Work Order 003305 describes and justifies the replacement as follows:
12		"WO Description: Install on above grade SE to ID & SH
13		"WO Description: Install an above grade SF to IP & SIF telemetric regulator station near Euclid & Hooke. The station is
14		needed to support the new City IP distribution system and wil
15		replace an existing SIP regulator station that is currently no
16		telemetric."
17		
18		"Reason for Work (Justification): The above grade SF to IP &
19		SIP is necessary to support the new distribution system. It is par
20		of the new City IP distribution system being installed."
21 22		Both Work Orders 003304 and 003305 provide the "Reason Code" for
22		Both Work Orders 003304 and 003303 provide the Reason Code 101
23		the replacements as "Strategic."
24		
	_	
25	Q.	DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
2526		Yes, it does.
20	A.	res, it does.
	I	

\$ 2,502,848.03	Difference between Budget and	\$ 1,263,441.67	Difference between Budget
\$ 5,729,647.79 \$ 3,897,099.37	Actual Additions July 2015 August 2015	\$ 2,132,095.23 \$ 15,855,346.44	Actual Additions July 2015 August 2015
\$ 1,912,710.66 \$ 5,211,188.47	July 2015 August 2015	\$ 8,113,000.00 \$ 8,611,000.00	July 2015 August 2015
	Budget Amounts		Budget Amounts
\$ 17,602,129.32	Total ISRS eligible additions MGE	\$ 43,764,732.50	Total ISRS eligible additions
\$ 18,916,217.87	Total ISRS eligible additions MGE	\$ 36,520,258.93	Total ISRS eligible additions
\$ 15,099,280.74	Total ISRS eligible additions MGE	\$ 42,501,163.70	Total ISRS eligible additions
Amount		Amount	
	MGE		Laclede

WORK		IN SERVICE	ADDITION
ORDER	DESCRIPTION	DATE	AMOUNT
001172	Refresh TM Regulator Stations	201503	(20,276.91
001172	Refresh TM Regulator Stations	201504	
001172	Refresh TM Regulator Stations	201505	
001172	Refresh TM Regulator Stations	201506	
001172	Refresh TM Regulator Stations	201507	
001172	Refresh TM Regulator Stations	201508	
003306	RTU Upgrade Phase 4	201503	
003306	RTU Upgrade Phase 4	201504	
003306	RTU Upgrade Phase 4	201505	
003306	RTU Upgrade Phase 4	201506	
003306	RTU Upgrade Phase 4	201507	
003306	RTU Upgrade Phase 4	201508	
003402	Upgrade ER System Equipment	201503	
003402	Upgrade ER System Equipment	201504	
003402	Upgrade ER System Equipment	201505	
003402	Upgrade ER System Equipment	201506	
003402	Upgrade ER System Equipment	201507	
003402	Upgrade ER System Equipment	201508	
005357	Refresh Existing TM Stations	201503	
005357	Refresh Existing TM Stations	201504	
005357	Refresh Existing TM Stations	201505	
005357	Refresh Existing TM Stations	201506	
005357	Refresh Existing TM Stations	201507	
005357	Refresh Existing TM Stations	201508	
604180	60418 UPGRADE INSTRUMENTATION	201310	205,916.37
604190	60419 REPL BRISTOL NETWRK RTU'S	201309	133,284.56

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Work Order Authorization Information

Header Detail

Work Order: 003304

Company: Laclede Gas Company

Work Order Title: Replace Osceola & Virginia Reg Sta

Business Segment: Distribution LDC 1 Functional Class: Distribution Plant

Wo Type Description: WO-Regulator Station Upgrade LGC

Department Code: 10525

Work Order Group: **Current Revision: 1**

Funding Project: 3602L

Department Description: Instrumentation & Control

Funding Project Desc: Replacement Regulator Station

Budget Description: Replacement Regulator Station

Est. Annual Revenue: \$0

Eligible for AFUDC yes

Eligible for CPI: yes Reimbursement Type: None

Reason Code: Strategic

Retirement Type:

WO Description:Install a new SF to IP telemetric below grade regulator station to replace existing station #519 near the intersection of Osceola & Virginia. The new station is designed to feed the new IP Distribution system for the City of St. Louis.

Estimated Start Date: Oct 01, 2013

Major Location: Reg. Stations - St. Louis City

Status: in service

Asset Location: Osceola & Virginia

Estimated In-Service Date:

Sep 30, 2014

Estimated Completion Date: Sep 30, 2014 Notes: Existing station #519 will be retired under separate work order.

Reason for Work (Justification)

The new SF-IP telemetric regulator station is necessary to support the new IP distribution system for the City of St. Louis

Approvals

Level	Approver	Approval Limit	Date Approved
Operational Accounting	Muehlenkamp, Anne	\$0	1/26/2014
Manager, I&C	Noelker, Bob	\$10,000	1/27/2014
Chief Operating Officer	Lindsey, Steve	\$500,000	2/5/2014
President & CEO	Sitherwood, Suzanne	\$999,999,999,999	2/5/2014

***** Unit Estimate *****									
Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage				
378000-Meas & Reg Station Equipment	\$673,104.00	\$0.00	\$673,104.00	\$0.00	\$0.00				
Total Estimated Costs:	\$673,104.00	\$0.00	\$673,104.00	\$0.00	\$0.00				

Work Order Authorization Information

Header Detail

Work Order: 003305

Work Order Title: Repl Euclid & Hooke Reg Station

Wo Type Description: WO-Regulator Station Upgrade LGC

Work Order Group:

Current Revision: 1

Funding Project: 3602L

Eligible for AFUDC yes Reason Code: Strategic

Funding Project Desc: Replacement Regulator Station

Eligible for CPI: yes

Company: Laclede Gas Company

Business Segment: Distribution LDC 1 Functional Class: Distribution Plant

Department Code: 10525

Department Description: Instrumentation & Control

Budget Description: Replacement Regulator Station

Status: in service

Est. Annual Revenue: \$0 Reimbursement Type: None

Retirement Type:

WO Description: Install an above grade SF to IP & SIP telemetric regulator station near Euclid & Hooke. The station is needed to support the

new City IP distribution system and will replace an existing SIP regulator station that is currently not telemetric.

Major Location: Reg. Stations - St. Louis City

Asset Location: Euclid & Hooke

Estimated Start Date: Oct 01, 2013

Estimated Completion Date: Sep 30, 2014

Estimated In-Service Date:

Sep 30, 2014

Notes: See attachment for list of retirements. 50% complete as of 9-17-14 per Kurt Biever

Reason for Work (Justification)

The above grade SF to IP & SIP is necessary to support the new distribution system. It is part of the new City IP distribution system being installed

Approvals

Level	Approver	Approval Limit	Date Approved	
Operational Accounting	Muehlenkamp, Anne	\$0	1/26/2014	
Manager, I&C	Noelker, Bob	\$10,000	1/27/2014	
Chief Operating Officer	Lindsey, Steve	\$500,000	2/5/2014	
President & CEO	Sitherwood, Suzanne	\$999,999,999,999	2/5/2014	

***** Unit Estimate *****								
Utility Account	Additions	Removal Cost	Total Expenditures	Retirement Value	Salvage			
375100-Struct & Impv - Meas & Reg S	\$0.00	\$0.00	\$0.00	\$1,518.24	\$0.00			
378000-Meas & Reg Station Equipment	\$571,857.00	\$24,704.00	\$596,561.00	\$12,714.71	\$4,982.00			
Total Estimated Costs:	\$571,857.00	\$24,704.00	\$596,561.00	\$14,232.95	\$4,982.0			