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| Exhibit No.: | _____ |
| Issue(s): | Weather Normalization Adjustment Rider (WNAR) |
| Witness/Type of Exhibit: | Seaver/Rebuttal |
| Sponsoring Party: | Public Counsel |
| Case No.: | GR-2021-0320 |

REBUTTAL TESTIMONY

OF

JORDAN SEAVER

Submitted on Behalf of the Office of the Public Counsel

**THE EMPIRE DISTRICT GAS COMPANY
D/B/A LIBERTY**

FILE NO. GR-2021-0320

March 17, 2022

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THE EMPIRE DISTRICT GAS COMPANY d/b/a LIBERTY
CASE No. GR-2021-0320**

1 **I. INTRODUCTION**

2 **Q. What is your name and what is your business address?**

3 A. My name is Jordan Seaver, and my business address is 200 Madison Street, Governor Office
4 Building, Suite 650, Jefferson City, MO 65102

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by the Office of Public Counsel (“OPC”) as a Policy Analyst.

7 **Q. Have you previously testified before the Missouri Public Service Commission?**

8 A. No.

9 **Q. What are your work and educational background?**

10 A. I previously worked as a Legal Assistant for Cascino Vaughan Law Offices for 7 years. I
11 have been employed as Policy Analyst by OPC since January 2022. I have a Master of
12 Arts in Philosophy from the University of Wyoming, and a Bachelor of Arts in Philosophy
13 from the University of Illinois at Chicago.

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

15 A. I propose recommended changes to the organizational structure of the rate tables proposed
16 in Timothy S. Lyons Direct Testimony to improve clarity, and I also express my concerns
17 about the attempts that Liberty (“Company”) will make to inform its customers about its
18 Weather Normalization Adjustment Rider (“WNAR”) and educate them on how the
19 WNAR will affect their utility bills.

1 **II. WEATHER NORMALIZATION ADJUSTMENT RIDER**

2 **Q. What is a Weather Normalization Adjustment Rider?**

3 A. The Weather Normalization Adjustment Rider is a proposed rate adjustment mechanism for
4 a gas utility such as Liberty to stabilize its revenue. It allows the Company to adjust its rates
5 outside of a rate case when the weather in the rate year is colder or warmer than the weather
6 predicted based on the historical test year. Because Liberty's prospective rates are in part
7 based on the projected normalized historical weather, the rates that it employs may not match
8 its annual cost of service when actual weather differs significantly. The proposed WNAR
9 would allow the Company to either collect revenue lost in the event of warmer actual weather,
10 or flow money back to ratepayers in the event of colder actual weather.

11 **Q. What are your concerns with Liberty's proposed WNAR tariff?**

12 A. I do not oppose the proposed tariff, but am recommending changes to pages 3 and 4 of the
13 Direct Schedule TSL-7 provided as an exhibit in the Direct Testimony of Timothy S. Lyons.
14 I am also recommending some additional measures to inform customers about the WNAR
15 rate since it offers a purported customer benefit.

16 **Q. Why are you proposing these changes?**

17 A. To improve clarity.

18 **Q. What are the specific changes that you recommend be made to the proposed tariff**
19 **sheets?**

20 A. On page 3 of Direct Schedule TSL-7, there are a number of clarity issues. The last column
21 labeled "CSWNA (Annual)" is one of the most important columns for understanding what
22 impact the WNAR will have on rates. I am recommending that this table be reorganized to
23 include "CSWNA (Annual)" column first, not last. I am recommending that the column

1 labeled “Months” should be eliminated, as it is apparent from other columns in the table that
2 the rate will be in effect for 12 months. This column needlessly complicates the table. Lastly,
3 I am recommending that the columns labeled “Rate First Effective” and “Rate Ending
4 Effective” be eliminated in favor of one column labeled “Rate Effective”. This column would
5 follow the column labeled “Period” and be the final column in the table. The information
6 included under this column heading would take the form of, e.g., “4/1/2023-3/31/2024”. I
7 recommend that these same changes be made for the equivalent columns in the other tables
8 on pages 3 and 4 of Direct Schedule TSL-7. For the SRR Table, these columns are labeled
9 “SRR (Annual)”, “Months”, “Rate First Effective”, and “Rate Ending Effective”. For the
10 WNA Rider Rate Table, these columns are labeled, “Monthly WNA Rider Rate”, “Months”,
11 “Rate First Effective”, and “Rate Ending Effective”. These proposed changes apply to all the
12 above-mentioned tables for both Residential Rates and Small General Service Rates for the
13 North-South and Northwest Regions. This means that I am recommending these changes to
14 all the tables on pages 3 and 4 of Direct Schedule TSL-7.

15 **Q. Do you have any other concerns with the proposed tariff itself?**

16 A. No.

17 **III. OTHER RECOMMENDATIONS**

18 **Q. What are your concerns about how Liberty might inform its customers about the
19 WNAR and to educate them on how the WNAR will affect their utility bills?**

20 A. I am concerned that Liberty may not sufficiently inform or educate their customers about the
21 WNAR and its effects on customer bills.

1 **Q. What do you recommend the Commission require Liberty to do to address those**
2 **concerns?**

3 A. The other recommendations are related to how the Company will give customers the
4 information included in the proposed tariff sheets in Direct Schedule TSL-7. I believe that
5 one of the goals of creating the tariff sheets is to make customers aware of what a rate is,
6 justifications for that rate, and how that rate will affect customers' bills. I propose that Liberty
7 make a FAQ on its website that answers likely questions relating to how this rate works, why
8 it is being billed to customers, what effects it could have on customer bills, with possible
9 examples of how that would look to typical customers who are concerned primarily with the
10 total amount they must pay. Potential questions to be answered on the web page are, "Why
11 am I being billed this rate?", "How long will this rate be billed to my account?", "Can I avoid
12 being billed this rate?", "How does weather affect my gas bill?" This list is not exhaustive,
13 but provides the Commission with an understanding of what I think a FAQ about the proposed
14 WNAR could look like. Not yet having done so, I intend to reach out to Liberty and other
15 stakeholders for a more comprehensive set of questions and answers to include on such a web
16 page.

17 **Q. Does this conclude your rebuttal testimony?**

18 A. Yes, it does.