Exhibit No.:	______________
Issue(s):	PGA/Uncollectables
Witness/Type of Exhibit:	Trippensee/Rebuttal
Sponsoring Party:	Public Counsel
Case No.:	GT-2009-0026

REBUTTAL TESTIMONY

OF

RUSSELL W. TRIPPENSEE

Submitted on Behalf of the Office of the Public Counsel

LACLEDE GAS COMPANY

CASE NO. GT-2009-0026

October 24, 2009

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Laclede Gas Company Tariff Filing to Recover Bad Debt Expenses Through the PGA and to Modify Cold Weather Rule Provisions	))))	**GT-2009-0026**

AFFIDAVIT OF RUSSELL W. TRIPPENSEE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Russell W. Trippensee, of lawful age and being first duly sworn, deposes and states:

1. My name is Russell W. Trippensee. I am Chief Public Utility Accountant 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.

Russell W. Trippensee

Russell W. Trippensee

Subscribed and sworn to me this 24th day of October, 2009.

NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

KENDELLE R. SEIDNER
My Commission Expires
February 4, 2011
Cole County
Commission #07004782

Kendelle R. Seidner

Kendelle R. Seidner
Notary Public

My Commission expires February 4, 2011.

REBUTTAL TESTIMONY

OF

RUSSELL W. TRIPPENSEE

LACLEDE GAS COMPANY

CASE NO. GT-2009-0026

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. Russell W. Trippensee. I reside at 1020 Satinwood Court, Jefferson City, Missouri 65109, and my business address is P.O. Box 2230, Jefferson City, Missouri 65102.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am the Chief Utility Accountant for the Missouri Office of the Public Counsel (OPC or Public Counsel).

Q. ARE YOU A CERTIFIED PUBLIC ACCOUNTANT?

A. Yes, I hold certificate/license number 2004012797 in the State of Missouri.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

A. I attended the University of Missouri at Columbia, from which I received a BSBA degree, major in Accounting, in December 1977. I also completed the requisite hours for a major in finance. I attended the 1981 NARUC Annual Regulatory Studies Program at Michigan State University. I have attended numerous seminars and conferences related to public utility regulation. Finally, I am required to take a minimum of 40 hours per year of continuing professional education to maintain my CPA license.

Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.

A. From May through August, 1977, I was employed as an Accounting Intern by the Missouri Public Service Commission (MPSC or Commission). In January 1978 I was employed by the MPSC as a

Public Utility Accountant I. I left the MPSC staff in June 1984 as a Public Utility Accountant III and assumed my present position.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL AFFILIATIONS.

A. I served as the chairman of the Accounting and Tax Committee for the National Association of State Utility Consumer Advocates from 1990-1992 and am currently a member of the committee. I am a member of the Missouri Society of Certified Public Accountants.

Q. PLEASE DESCRIBE YOUR WORK WHILE YOU WERE EMPLOYED BY THE MPSC STAFF.

A. Under the direction of the Chief Accountant, I supervised and assisted with audits and examinations of the books and records of public utility companies operating within the State of Missouri with regard to proposed rate increases.

Q. WHAT IS THE NATURE OF YOUR CURRENT DUTIES WITH THE OFFICE OF THE PUBLIC COUNSEL?

A. I am responsible for the Accounting section of the Office of the Public Counsel and coordinating our activities with the rest of our office and other parties in rate proceedings. I am also responsible for performing audits and examinations of public utilities and presenting the findings to the MPSC on behalf of the public of the State of Missouri.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MPSC?

A. Yes. I filed testimony in the cases listed on Schedule RWT-1 of my testimony on behalf of the Missouri Office of the Public Counsel or MPSC Staff.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. To provide OPC's response to the request by Laclede Gas Company (Laclede or Company) to expand the Purchase Gas Adjustment (PGA) tariff charge to include uncollectible expense in addition to the gas costs currently allowed in the PGA. I will address the direct testimonies of Glenn Buck and Michael Cline who filed on behalf of Laclede.

Q. PLEASE EXPLAIN LACLEDE'S PROPOSAL AS YOU UNDERSTAND IT.

A. The Company proposes to adjust the PGA to reflect alleged uncollectible revenues based on a computation that compares annual net write-offs multiplied by the ratio of gas revenues to total revenues and then subtract a specific amount that Laclede alleges is contained in base rates. The result of this calculation is then divided by 12 and the result is added or subtracted from the actual gas costs included in the PGA / Actual Gas Cost Adjustment (ACA) process.

Q. DOES PUBLIC COUNSEL SUPPORT LACLEDE'S PROPOSAL?

A. No.

Q. PLEASE SET OUT THE REASONS PUBLIC COUNSEL OPPOSES THE PROPOSAL AS PRESENTED IN THIS CASE?

A. Public Counsel believes the proposal has several problems, specifically;

1. Uncollectible Expense is not a gas cost and as such should not be included in the PGA/ACA process.

2. The proposal constitutes single issue ratemaking without consideration of all other relevant factors.

3. The proposal constitutes retro-active ratemaking which counsel has advised is prohibited in the state of Missouri.

4. Laclede's proposal is a violation of the specific terms and agreements contained in the Stipulation and Agreement signed by Laclede, Public Counsel, and various other parties in Case No. GR-2007-0208, which was approved by the Commission.

5. Reduces incentive to implement appropriate collection processes with respect to bills rendered thus placing additional risk on other customers' rates to reflect increased bad debt costs.

Q. YOU ASSERT THAT UNCOLLECTIBLE EXPENSE IS NOT A GAS COST. CAN YOU POINT TO ANY AUTHORITATIVE SOURCE THAT SUPPORTS YOUR POSITION?

A. Yes. Laclede is required to maintain it books and records in conformance with the Uniform System of Accounts (USOA) as set out by the Federal Energy Regulatory Commission (FERC). A review of the USOA proves without any ambiguity that the FERC does not classify uncollectible expense as a gas cost. USOA account 904 has the following definition for uncollectible expense;

> This account shall be charged with amounts sufficient to provide for losses from uncollectible utility revenues. Concurrent credits shall be made to account 144, Accumulated Provision for Uncollectible Accounts—Credit. Losses from uncollectible accounts shall be charged to account 144.

USOA account 144 has the following definition;

> This account shall be credited with amounts provided for losses on accounts receivable which may become uncollectible, and also with collections on accounts previously charged hereto. Concurrent charges shall be made to account 904, Uncollectible Accounts, for amounts applicable to utility operations, and to corresponding accounts for other operations. Records shall be maintained so as to show the write-offs of accounts receivable for each utility department.

These definitions clearly do not define uncollectible expense as a gas cost. An estimate of a utilities inability to collect revenue is recorded as uncollectible expense and thus earnings are reduced in that period in which the revenues are recorded. At the same time, a reserve account is set up, USOA account 144, to account for the actual failure to receive cash from the customer for the billed revenues.

The failure to receive the cash does not change uncollectible expense (the failure to collect revenues) into gas costs as Laclede asserts. Gas costs are also addressed in the USOA and found in accounts 800 through 813. A review of the USOA definitions of these respective categories of gas costs does not contain any reference to revenues or uncollectible expense. Laclede's continued efforts to redefine gas cost are in conflict with the USOA and Generally Accepted Accounting Principles. I am aware of no GAAP that would require that the expense reflecting payments to third party vendors be increased to reflect a company's inability to collect revenue from its own customers.

Q. IS THERE ANOTHER DISTINCTION BETWEEN GAS COST EXPENSE AND UNCOLLECTIBLE EXPENSE?

A. Yes. Uncollectible expense does not require Laclede to pay a third party that provides goods or service, whereas Laclede does pay third parties for its gas costs. Uncollectible expense is simply a journal entry on the Company's financial records that at no time represents the outflow of cash or other assets to a third party. Outside of its gas acquisition policies and procedures, a utility has been deemed to have minimal if any control over the actual cost of gas and the resulting payments to third parties. In contrast, a utility has operational control over its policies and procedures to collect bad debts. Laclede even discusses in the testimony the incentive it maintains to collect it revenue with the 25% portion of bad-debt write-offs it proposes to exclude from the PGA process.

The Commission has recognized the value of incentives and that prudence review are not a good substitute for the company's own desire to improve its bottom line.

> Although the Fund would be subject to audit by Staff and Public Counsel and they could seek a prudence adjustment, the need for a prudence adjustment is difficult to prove and is not a good substitute for the company's own desire to prudently minimize its costs to improve its bottom line.

> (MPSC, Report and Order, GR-2006-0422, page 19, issued March 22, 2007)
>
> The Fund would be subject to audit by Staff and Public Counsel and they could seek a prudence adjustment if necessary. But the need for a prudence adjustment is difficult to prove and is not a good substitute for the company's own desire to prudently minimize its costs to improve its bottom line.
>
> (MPSC, Report and Order, GR-2004-0209, page 38, issued September 21, 2004)

Q. PLEASE EXPLAIN WHY LACLEDE'S PROPOSAL WOULD CONSTITUTE SINGLE ISSUE RATEMAKING.

A. Laclede is proposing to change the PGA tariff in a manner that allows rates charged to customers to fluctuate based on the increase or decrease in uncollectible write-offs without considering all other relevant factors. Absent consideration of all other relevant factors, it cannot be determined if the resulting rates will result in a just and reasonable return on equity.

Q. WOULD CHANGES IN UNCOLLECTIBLE EXPENSE HAPPEN IN A VACUUM WITH RESPECT TO OTHER POSSIBLE CHANGES IN THE OPERATIONS OF THE UTILITY?

A. No. The overall cost of service is made up of a multitude of factors. Isolating or focusing on only one component, such as uncollectibles, fails to look at all relevant factors in determining the overall cost of service. Other factors may have changed that have a corresponding decrease or increase on the overall cost of service. Unless all factors are analyzed, it is not appropriate to single out one specific event. The effect of singling out a normal on-going cost for special treatment without consideration of all relevant factors is commonly referred to as single-issue ratemaking.

Q. DO YOU AGREE WITH LACLEDE'S WITNESS MICHAEL CLINE'S STATEMENT THAT "THE COMPANY SHOULD BE ENTITLED TO BE KEPT WHOLE FOR ALL OF THE GAS COSTS IT INCURS"?

A. No, I cannot agree with his assertion. I believe Staff counsel said it very succinctly in a brief filed in Case GO-2002-175 when Staff stated;

> The PGA/ACA process was instituted to insure that LDCs had the opportunity to bill the entire amount of gas costs that they incurred in providing service to customers, and that customers are not billed for gas costs not actually incurred by the LDCs.

Laclede wishes to include costs other than gas costs in the rates it is allowed to bill under the PGA which changes the very essence of the PGA process from a billed revenue basis to a cash collection basis. This moves the regulatory process from an opportunity to earn a return on equity toward a regulatory regime that would guarantee a return on equity.

Q. DOES UTILITY REGULATORY THEORY ANTICIPATE THAT THERE WILL BE CHANGES IN THE COST COMPONENTS THAT MAKE UP THE OVERALL COST OF SERVICE?

A. Yes, I believe that would be a fair characterization. Rate of Return regulation anticipates overages and underages with respect to any specific cost component, the level of customers, sales and the resulting revenues. However, the critical point to recognize is that the determination as to whether rates are adequate or not is the measurement of the rate of return on equity, not an individual cost component, level of customers, or level of sales. It should also be noted that the courts have found that the regulatory process also provides the stockholder the opportunity, <u>not a guarantee</u>, to earn a rate of return. That opportunity involves business risk. Absent risk, authorized returns would reflect a risk-free return such as US government securities (T-bills).

Any event such as an abnormally cool summer or warm or cold winter would have a significant impact on revenues and thus earnings. Other significant impacts could occur from any event in the normal course of utility operations that had a material impact on earning. Other cyclical costs that are normalized for ratemaking treatment but expensed on the utilities financial records include tree-trimming expenses for electric utilities, tank painting for water utilities, and over-time hours for all types of utilities. All of these events are part of the normal business risks faced by a utility. The traditional regulatory process has procedures, which are normally used in ratemaking proceedings, which address these variable factors, and provides the utilities with an opportunity but not a guarantee to earn its rate of return.

Q. LACLEDE WITNESS BUCK DISCUSSES THE IMPACT OF A CHANGE IN UNCOLLECTIBLE EXPENSE AND THE RESULTING IMPACT ON EARNINGS (DIRECT TESTIMONY, PAGES 5 & 6). DO YOU HAVE ANY GENERAL COMMENTS ON HIS ASSERTION?

A. Yes. This argument could be made for other expense categories as they can have dramatic changes also at least when measured as a percentage of change. A change in a single category of expense, investment, revenue, or customer levels without a change in any other of the components of the overall cost of service will impact earnings. The result is that the relationship between all the cost of service components has been altered to a degree that the level of earnings is no longer appropriate. The time period from the change in earnings until a change in rates occurs is referred to as regulatory lag. It must be recognized that regulatory lag can provide both for retention by the utility of earnings above a reasonable level and a period where earnings, while positive, are not at the authorized level. Regulatory Lag is the term that refers to the period between the imbalance occurring and the time rates are adjusted to reflect the imbalance. Regulatory Lag is an integral part of the incentive procedures built into the regulatory process to ensure customers have just and reasonable rates and utilities operate in a prudent manner.

Q. HAVE THIS COMMISSION ADDRESSED REGULATORY LAG?

A. Yes. This Commission has held that it is **not** reasonable to protect shareholders from all regulatory lag. In Missouri Public Service Company, Cases Nos. EO-91-358 and EO-91-360, the Commission stated:

> Lessening the effect of regulatory lag by deferring costs is beneficial to a company but not particularly beneficial to ratepayers. Companies do not propose to defer profits to subsequent rate cases to lessen the effects of regulatory lag, but insist it is a benefit to defer costs. Regulatory lag is a part of the regulatory process and can be a benefit as well as a detriment. Lessening regulatory lag by deferring costs is not a reasonable goal unless the costs are associated with an extraordinary event.
>
> Maintaining the financial integrity of a utility is also a reasonable goal. The deferral of costs to maintain current financial integrity though is of questionable benefit. If a utility's financial integrity is threatened by high costs so that its ability to provide service is threatened, then it should seek interim rate relief. If maintaining financial integrity means sustaining a specific return on equity, this is not the purpose of regulation. It is not reasonable to defer costs to insulate shareholders from any risks. If costs are such that a utility considers its return on equity unreasonably low, the proper approach is to file a rate case so that a new revenue requirement can be developed which allows the company the opportunity to earn its authorized rate of return. Deferral of costs just to support the current financial picture distorts the balancing process used by the Commission to establish just and reasonable rates. Rates are set to recover ongoing operating expenses plus a reasonable return on investment. Only when an extraordinary event occurs should this balance be adjusted and costs deferred for consideration in a later period (Emphasis added).

Laclede is not proposing to go through the formal accounting steps of deferring uncollectible expense in this case as was the deferral issue in the Commission case cited above. However, the impact on earnings of Laclede's proposal would have the same impact on earnings. Laclede proposes to increase future rates to reflect a past expense. An Accounting Authority Order also anticipates a future rate adjustment plus it takes the formal accounting step of deferring the expense in the period it was incurred.

Q. YOU DISCUSSED OTHER EXPENSES THAT COULD HAVE AN IMPACT ON EARNINGS IF THEY EXPERIENCED CHANGES. CAN YOU PROVIDE AN EXAMPLE?

A. Yes, Laclede experienced $83,575,761 of payroll expense for its utility operations per its publically filed annual report with the MPSC (Laclede's FERC Form 2, 2007, page 355). A reasonable cost of living adjustment to the pay scale of 3% would result in a $2,507,272 change in earnings if all other factors remained equal in the subsequent year. This possible change in earnings is greater than any increase or decrease that results from a comparison of the bad-debt write-offs found on page 5 of Mr. Buck's direct testimony except for the impact of the year 2002. I have reproduced Mr. Buck's table and added a column to show the increases/decreases by year.

Fiscal Year	Actual Write-Offs	Percentage Change	Increases/ Decreases from Prior Year
1998	$ 7,584,521		
1999	5,377,844	-29%	$ (2,206,677)
2000	4,583,253	-15%	(794,591)
2001	5,379,383	17%	796,130
2002	11,294,193	110%	5,914,810
2003	7,481,477	-34%	(3,812,716)
2004	9,139,788	22%	1,658,311
2005	10,547,022	15%	1,407,234
2006	10,724,707	2%	177,685
2007	11,352,394	6%	627,687

Q. PLEASE DEFINE THE TERM "COST" AS USED IN YOUR TESTIMONY.

A. I use the term "cost" to refer to each component of the total revenue requirement of the utility. Cost includes all expenses along with the earnings and interest expense associated with the rate base. The total revenue requirement is also called the overall cost of service.

Q. WHAT IS AN EXPENSE?

A. Expense is the use of assets and services in the creation of revenue during a specified period. Expenses are recorded on the income statement and are subtracted from revenues in order to determine net income (earnings) for the period

Q. WOULD THE INCREASED REVENUES DUE TO A COLDER THAN NORMAL WINTER ALSO INCREASE THE FUNDS AVAILABLE TO OFFSET INCREASED EXPENSE (AND THEREFORE MAINTAIN OR INCREASE EARNINGS) AS IT RELATES TO NOT ONLY UNCOLLECTIBLES BUT ALSO OTHER SPECIFIC EXPENSES?

A. Yes. Based on regulatory practices, a certain level of each expense plus return on equity makes up each dollar of revenue. The expected revenue received is based on a normalized level of gas sales. To the extent a colder winter would generate more sales and therefore more revenue, the utility would recover revenues sufficient to provide funds to pay increased expenses and provide greater earnings than anticipated. To single out one factor, such as uncollectibles, without looking at all offsetting factors, such as increased revenues, would constitute single issue ratemaking.

Rate of Return Regulation is not cost recovery regulation. Utilities are dynamic entities that are constantly changing and face constantly changing operating environments. Rate of return regulation looks at the relationship of all relevant factors and determines if the resulting return is appropriate. A cost component could change 100% and earnings may or may not be impacted, just as new investments may or may not generate sufficient revenues to maintain earnings. Only a review of all relevant factors can make that determination.

Q. LACLEDE'S WITNESS BUCK DISCUSSES A 50% INCREASE IN BAD DEBT WRITE-OFF WOULD EQUATE TO 10% OR MORE OF THE UTILITY NET INCOME. PLEASE COMMENT ON HIS ASSERTION THAT THIS IS A SIGNIFICANT IMPACT.

A. The impact on earnings must be looked at in nominal dollars, not percentages as percentages are impacted by the size of the denominator. An increase in expense of $2 is 100% greater than $1 dollar level of expense in the prior year but the impact on earnings is only $1. Mr. Buck's use of a 50% increase highlights the problem of looking at percentages as your primary factor. As revenues increase, it will take significantly larger nominal amount of bad-debt write-offs to generate a large percentage. It should also be pointed out that Laclede has experienced an increase in bad-debt write-offs greater than 22% only one time during the last 10 years as can be seen on Mr. Buck's own schedule which I have reproduced earlier in my testimony. That percentage increase in the level of uncollectibles occurred following the year 2001 in which revenues were 75% greater than the year 2000. The year 2000 had revenues of $529,250,000. In contrast, 2007 revenues are $1,131,564,000 and 2007 bad-debt write-offs are within $60,000 of the 2002 levels which generated the only increase in bad-debt write-off in excess of 22%.

Bad-debt write-offs for the years 2005 – 2007 have remained basically flat despite revenues having grown during the period 2004 to 2007. I reference 2004 since bad-debt write-offs lag revenues by almost a year for Laclede. The table below shows revenues by year for Laclede since 1997.

Year	Revenues	Change from prior year	Percent Change
1997	602,832,000		
1998	547,229,000	(55,603,000)	-9.22%
1999	473,031,000	(74,198,000)	-13.56%
2000	529,250,000	56,219,000	11.88%
2001	923,242,000	393,992,000	74.44%
2002	592,097,000	(331,145,000)	-35.87%
2003	774,772,000	182,675,000	30.85%
2004	868,905,000	94,133,000	12.15%
2005	978,195,000	109,290,000	12.58%
2006	1,141,011,000	162,816,000	16.64%
2007	1,131,554,000	(9,457,000)	-0.83%

Source: Laclede response to OPC Data Request #8

Q. IF FINANCIAL IMPACT IS THE ONLY CONSIDERATION, WOULD THAT OPEN A FLOODGATE OF OPPORTUNITY FOR A UTILITY TO MANAGE ITS EARNINGS THROUGH THE USE A TRACKER MECHANISM AS PROPOSED BY LACLEDE IN THIS CASE?

A. Yes. An event such as an abnormally cool summer or warm or cold winter would have a significant impact on revenues and thus earnings. Other significant impacts could occur from any event in the normal course of utility operations that had a material impact on earning such as the impact of an annual cost of living adjustment for payroll. Other cyclical costs that are normalized for ratemaking treatment but expensed on the utilities financial records include tree-trimming expenses for electric utilities, tank painting for water utilities, and over-time hours for all types of utilities. All of these events are part of the normal business risks faced by a utility. The traditional regulatory process has procedures, which are normally used in ratemaking proceedings, which address these variable factors, and provides the utilities with an opportunity but not a guarantee to earn its rate of return.

Q. IS THE PROPOSAL BY LACLEDE RETROACTIVE RATEMAKING IN PUBLIC COUNSEL'S OPINION?

A. Yes. Laclede is proposing to single out a past expense (and the resulting decrease in earnings) and factor that amount into a rate that is effective in the future. This treatment perfectly describes retroactive ratemaking.

Q. IS IT YOUR UNDERSTANDING THAT RETROACTIVE RATEMAKING IS PROHIBITED IN MISSOURI?

A. Yes. As stated by the Missouri Supreme Court:

> [p]ast expenses are used as a basis for determining what rate is reasonable to be charged in the future in order to avoid further excess profits or future losses, but under the prospective language of the statutes, Sections 393.270(3) and 393.140(5) they cannot be used to set future rates to recover for past losses due to imperfect matching of rates with expenses.
>
> State ex rel. Utility Consumers Council v. Public Service Commission, 585 S.W.2d 41, 59 (Mo. Banc 1979) (citations omitted)

Q. YOU ASSERTED EARLIER THAT LACLEDE'S PROPOSAL VIOLATES SPECIFIC TERMS AND AGREEMENTS IN THE STIPULATION AND AGREEMENT SIGNED BY LACLEDE AND ADOPTED BY THE COMMISSION IN CASE NO. GR-2007-0208. PLEASE EXPLAIN WHY YOU MAKE THAT ASSERTION.

A. The rates approved by the Commission in Case No. GR-2007-0208 resulted from a Stipulation and Agreement among the various parties to the case that contains the following language;

> None of the signatories to this Stipulation and Agreement shall be deemed to have approved or acquiesced in any ratemaking or procedural principle, including, without limitation, any method of cost determination or cost allocation, depreciation or revenue related method, any service or payment standard, and none of the signatories shall be prejudiced or bound in any manner by the terms of this Stipulation and Agreement in this or any other Commission, judicial review or other proceeding, except as expressly specified herein.

(Paragraph 25 on page 22 of Stipulation and Agreement)

Laclede's proposal in this case is based on the assertion that a specific level of uncollectible expense was used to set rates in Case No. GR-2007-0208. (Cline Direct, page 4, lines 5 – 12 and Buck Direct, page 3, 13 – 15). A review of the Stipulation and Agreement in Case No. GR-2007-0208 does not contain any reference to the level of uncollectible expense used in determining the overall cost of service (revenue requirement) and the resulting tariff rates. Paragraph 1, entitled Revenue Requirement, simply sets out the revenue increase agreed to by the parties. This agreement was what is commonly referred to as a black box settlement. Laclede's attempt to shine light into that block should not be tolerated.

Laclede's attempt to assert what made up the revenue requirement used to develop current rates resulting from a settled case is a flagrant violation of the agreement and if approved by the Commission will have deep freeze effect on Public Counsel's, and in our opinion other parties', willingness to settle any future rate case.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

Missouri Power & Light Company, Steam Dept., Case No. HR-82-179
Missouri Power & Light Company, Electric Dept., Case No. ER-82-180
Missouri Edison Company, Electric Dept., Case No. ER-79-120
Southwestern Bell Telephone Company, Case No. TR-79-213
Doniphan Telephone Company, Case No. TR-80-15
Empire District Electric Company, Case No. ER-83-43
Missouri Power & Light Company, Gas Dept., Case No. GR-82-181
Missouri Public Service Company, Electric Dept., Case No. ER-81-85
Missouri Water Company, Case No. WR-81-363
Osage Natural Gas Company, Case No. GR-82-127
Missouri Utilities Company, Electric Dept., Case No. ER-82-246
Missouri Utilities Company, Gas Dept., Case No. GR-82-247
Missouri Utilitites Company, Water Dept., Case No. WR-82-248
Laclede Gas Company, Case No. GR-83-233
Great River Gas Company, Case No. GR-85-136 (OPC)
Northeast Missouri Rural Telephone Company, Case No. TR-85-23 (OPC)
United Telephone Company, Case No. TR-85-179 (OPC)
Kansas City Power & Light Company, Case No. ER-85-128 (OPC)
Arkansas Power & Light Company, Case No. ER-85-265 (OPC)
KPL/Gas Service Company, GR-86-76 (OPC)
Missouri Cities Water Company, Case Nos. WR-86-111, SR-86-112 (OPC)
Union Electric Company, Case No. EC-87-115 (OPC)
Union Electric Company, Case No. GR-87-62 (OPC)
St. Joseph Light and Power Company, Case Nos. GR-88-115, HR-88-116 (OPC)
St. Louis County Water Company, Case No. WR-88-5 (OPC)
West Elm Place Corporation, Case No. SO-88-140 (OPC)
United Telephone Long Distance Company, Case No. TA-88-260 (OPC)
Southwestern Bell Telephone Company, Case No. TC-89-14, et al. (OPC)
Osage Utilities, Inc., Case No. WM-89-93 (OPC)
GTE North Incorporated, Case Nos. TR-89-182, TR-89-238, TC-90-75 (OPC)
Contel of Missouri, Inc., Case No. TR-89-196 (OPC)
The Kansas Power and Light Company, Case No. GR-90-50 (OPC)
Southwestern Bell Telephone Company, Case No. TO-89-56 (OPC)
Capital City Water Company, Case No. WR-90-118 (OPC)
Laclede Gas Company, Case No. GR-90-120 (OPC)
Southwestern Bell Telephone Company, Case No. TR-90-98 (OPC)

Empire District Electric Company, Case No. ER-90-138 (OPC)
Associated Natural Gas Company, Case No. GR-90-152 (OPC)
Southwestern Bell Telephone Company, Case No. TO-91-163 (OPC)
Union Electric Company, Case No. ED-91-122 (OPC)
Missouri Public Service, Case Nos. EO-91-358 and EO-91-360 (OPC)
The Kansas Power and Light Company, Case No. GR-91-291 (OPC)
Southwestern Bell Telephone Co., Case No. TO-91-163 (OPC)
Union Electric Company, EM-92-225 and EM-92-253 (OPC)
Southwestern Bell Telephone Company, TO-93-116(OPC) (OPC)
Missouri Public Service Company, ER-93-37, (January, 1993) (OPC)
Southwestern Bell Telephone Company, TO-93-192, TC-93-224 (OPC)
Saint Louis County Water Company, WR-93-204 (OPC)
United Telephone Company of Missouri, TR-93-181 (OPC)
Raytown Water Company, WR-94-300 (OPC)
Empire District Electric Company, ER-94-174 (OPC)
Raytown Water Company, WR-94-211 (OPC)
Missouri Gas Energy, GR-94-343 (OPC)
Capital City Water Company, WR-94-297 (OPC)
Southwestern Bell Telephone Company, TR-94-364 (OPC)
Missouri Gas Energy, GR-95-33 (OPC)
St. Louis County Water Company, WR-95-145 (OPC)
Missouri Gas Energy, GO-94-318 (OPC)
Alltel Telephone Company of Missouri, TM-95-87 (OPC)
Southwestern Bell Telephone Company, TR-96-28 (OPC)
Steelville Telephone Exchange, Inc., TR-96-123 (OPC)
Union Electric Company, EM-96-149 (OPC)
Imperial Utilites Corporation, SC-96-247 (OPC)
Laclede Gas Company, GR-96-193 (OPC)
Missouri Gas Energy, GR-96-285 (OPC)
St. Louis County Water Company, WR-96-263 (OPC)
Village Water and Sewer Company, Inc. WM-96-454 (OPC)
Empire District Electric Company, ER-97-82 (OPC)
UtiliCorp d/b/a Missouri Public Service Company, GR-95-273 (OPC)
Associated Natural Gas, GR-97-272 (OPC)
Missouri Public Service, ER-97-394, ET-98-103 (OPC)
Missouri Gas Energy, GR-98-140 (OPC)

St. Louis County Water, WO-98-223 (OPC)
United Water Missouri, WA-98-187 (OPC)
Kansas City Power & Light/Western Resources, Inc. EM-97-515 (OPC)
St. Joseph Light & Power Company, HR-99-245 (OPC)
St. Joseph Light & Power Company, GR-99-246 (OPC)
St. Joseph Light & Power Company, ER-99-247 (OPC)
AmerenUE, EO-96-14, (prepared statement) (OPC)
Missouri American Water Company, WR-2000-281 (OPC)
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