

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

1
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6
7
8
9

TABLE OF CONTENTS
OF
SURREBUTTAL TESTIMONY OF
KEENAN B. PATTERSON, PE
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EXECUTIVE SUMMARY1

TELEMETRY1

1 **SURREBUTTAL TESTIMONY OF**

2 **KEENAN B. PATTERSON**

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

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

6 Q. Please state your name and business address.

7 A. My name is Keenan B. Patterson. My work address is 200 Madison Street,
8 P.O. Box 360, Jefferson City, MO 65102.

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

10 A. I work for the Missouri Public Service Commission (“Commission”) as a Senior
11 Professional Engineer, a member of Commission Staff (“Staff”).

12 Q. Are you the same Keenan B. Patterson who filed rebuttal testimony on
13 March 17, 2022, in this case?

14 A. Yes.

15 **EXECUTIVE SUMMARY**

16 Q. What is the purpose of your surrebuttal testimony?

17 A. The purpose of this testimony is to correct certain misstatements related to the
18 requirements for telemetry for transportation customers that appeared in the rebuttal testimony
19 of Ms. Tatiana Earhart, a witness for The Empire District Gas Company (“Empire”).

20 **TELEMETRY**

21 Q. What statement in Ms. Earhart’s rebuttal testimony was incorrect?

22 A. Ms. Earhart stated, “Under EDG’s tariffs, all large volume transportation

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

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.²

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.³ 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.

¹ Earhart rebuttal, pg. 6, ll. 6-8.

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

³ 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.

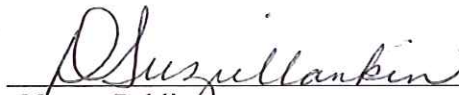


KEENAN B. PATTERSON, PE

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 8th 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



Notary Public