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Witness: Jeffery Westfall
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Sponsoring Party: The Empire District
Electric Company
Case No.: ER-2021-0312
Date Testimony Prepared: January 2022

**Before the Public Service Commission
of the State of Missouri**

Surrebuttal Testimony

of

Jeffery Westfall

on behalf of

The Empire District Electric Company

January 2022



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FOR THE SURREBUTTAL TESTIMONY OF JEFFERY WESTFALL
THE EMPIRE DISTRICT ELECTRIC COMPANY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
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1 I. **INTRODUCTION**

2 Q. **Please state your name and business address.**

3 A. My name is Jeffery Westfall, and my business address is 602 S. Joplin Avenue, Joplin,
4 Missouri, 64801.

5 Q. **Are you the same Jeffery Westfall who provided Direct Testimony in this matter
6 on behalf of The Empire District Electric Company (“Empire” or the
7 “Company”)?**

8 A. Yes. My Direct Testimony provided an overview of the transmission and distribution
9 investments made by Empire to provide increased reliability to our customers and
10 improve system operability and safety, and I provided practical examples of the
11 Company’s strategy to proactively mitigate outage risk by replacing equipment found
12 to be in poor or otherwise non-conforming condition based on objective evidence
13 collected through field inspections.

14 Q. **What is the purpose of your Surrebuttal Testimony in this proceeding before the
15 Missouri Public Service Commission (“Commission”)?**

16 A. I respond to Dr. Geoff Marke regarding the possibility of a voltage optimization study
17 and to the reliability recommendations of Commission Staff (“Staff”) provided in
18 rebuttal testimony by Saeid Dindarloo.

1 **II. RESPONSE TO OPC**

2 **Q. Does the Company agree with OPC witness Geoff Marke’s recommendation for a**
3 **voltage optimization study?**

4 A. No.

5 **Q. Does OPC demonstrate that a voltage optimization study needs to be performed**
6 **at this time?**

7 A. No. On pages 34-35 of his rebuttal testimony, Dr. Marke states that some utilities
8 “overpower homes and businesses with more voltage than is needed” and then
9 immediately requests a voltage optimization study to be performed by a third party.
10 The statement does not reference any data that supports the need for a voltage
11 optimization study, nor does OPC reference any customer complaints that allege
12 Empire has “overpowered” a customer’s home or business.

13 **Q. Is it possible for Empire to determine if a voltage optimization study may be**
14 **needed?**

15 A. Yes. Empire recently installed AMI for a multitude of customer benefits, one being the
16 ability to review service quality to our customers. Empire is currently working to
17 understand all of the opportunities associated with this new influx of available data.
18 Through the analysis of the AMI data, new initiatives will be prioritized based on value
19 and the ability to implement. It will be through the analysis of the AMI data which will
20 indicate the value of a voltage optimization study.

21 **Q. Would Empire be willing to engage a third party to perform a voltage**
22 **optimization study in the future?**

23 A. Possibly. Absent a lawful requirement, it should be Empire’s management discretion
24 to determine which studies should be performed based upon expert data analysis.

1 Studies consume resources, whether conducted by a third party or performed inhouse.
2 Studies should be performed based on the ability to provide value to customers. Empire
3 is committed to operating its system in such a manner to provide the highest quality of
4 service to our customers, and, in so doing, performing studies as needed to ensure
5 continued high quality service.

6 **Q. Is Empire willing to discuss the future possibility of a voltage optimization study**
7 **with OPC?**

8 A. Of course. The Company is always happy to work with OPC and other interested
9 stakeholders.

10 **III. RESPONSE TO STAFF’S RECOMMENDATIONS**

11 **Q. What are Staff’s reliability recommendations?**

12 A. On pages 6-7 of his rebuttal testimony, Staff witness Saeid Dindarloo makes two
13 recommendations. First, he recommends that “Empire continue to invest in its
14 reliability improvement programs, to further improve its reliability performance to
15 further reduce the gap between its reliability and other IOUs in the region.” Second,
16 “Staff recommends that the Commission order Empire to provide an annual report
17 to update the status of its reliability improvement projects and expenditures in a format
18 similar, but not limited, to Schedule JW-1 of the direct testimony of Mr. Westfall, and
19 to identify and justify future reliability improvement opportunities.”

20 **Q. Does the Company agree with Staff’s first recommendation?**

21 A. Not entirely, Empire does believe it should continue to invest in reliability programs to
22 further improve reliability, system operability, and safety; however, it does not agree
23 with the supposition that there is a “gap” in performance between Empire and other
24 IOUs in the region.

1 **Q. Does the Company agree with Staff’s second recommendation?**

2 A. No, the Company does not agree with the additional reporting requirement as
3 recommended by Staff.

4 **Q. Please explain.**

5 A. First, as noted by Staff witness Dindarloo, the Commission has implemented a rule on
6 reliability reporting. Staff has not demonstrated a need for additional reporting by
7 Empire or why such additional reporting would not be redundant to the Commission’s
8 existing rule. Additionally, Staff has not demonstrated that there would be customer
9 benefits resulting from the additional cost.

10 **Q. Does the Company have an alternative to Staff’s recommended additional annual
11 reporting?**

12 A. Yes. Empire proposes that Company representatives meet annually with Staff and other
13 stakeholders to discuss ongoing reliability initiatives, and any other pertinent matters.
14 Empire believes the dialog will better address concerns by allowing for collaborative
15 input on initiatives.

16 **Q. Are there additional statements in Staff witness Dindarloo’s rebuttal testimony
17 that you would like to address?**

18 A. Yes. On page 7, Staff recommends “that Empire invests only in reliability projects
19 that are reasonably deemed effective in improving the reliability of its distribution
20 systems, when measured using reliability indices.

21 **Q. Does the Company agree with this additional recommendation?**

22 A. No, the Company does not agree that reliability indices should be the only
23 measurement.

1 **Q. Please explain.**

2 A. While reliability indices can help us to continue to measure our reliability levels and
3 help target the need for certain reliability projects, we feel it is important to also utilize
4 projects that are proactive as well. For example, our circuit inspections are scheduled
5 to cover every circuit, not only those circuits that have higher reliability indices. We
6 feel there should be a combination of proactive and reactive approaches addressing
7 reliability.

8 **Q. Does this conclude your Surrebuttal Testimony?**

9 A. Yes, at this time.

VERIFICATION

I, Jeffery Westfall, under penalty of perjury, on the 20th day of January, 2022, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Jeffery Westfall