

Exhibit No.
Issue: Praxair Tariff
Witness: Jayna R. Long
Type of Exhibit: Supplemental Direct
Testimony
Sponsoring Party: Empire District Electric
Case No. ER-2011-0004
Date Testimony Prepared: November 2010

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

Supplemental Direct Testimony

of

Jayna R. Long

November 2010

SUPPLEMENTAL DIRECT TESTIMONY
OF
JAYNA R. LONG
THE EMPIRE DISTRICT ELECTRIC COMPANY
BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. ER-2011-0004

1 **Q. STATE YOUR NAME AND ADDRESS PLEASE.**

2 A. My name is Jayna R. Long and my business address is 602 S. Joplin Avenue,
3 Joplin, Missouri.

4 **Q. ARE YOU THE SAME JAYNA R. LONG THAT EARLIER PREPARED**
5 **AND FILED DIRECT TESTIMONY IN THIS RATE CASE BEFORE THE**
6 **MISSOURI PUBLIC SERVICE COMMISSION (“COMMISSION”) ON**
7 **BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY**
8 **(“EMPIRE” or “COMPANY”)?**

9 A. Yes.

10 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT**
11 **TESTIMONY?**

12 A. To submit a proposed tariff sheet.

13 **Q. PLEASE EXPLAIN.**

14 A. As a result of the expiration of a prior contract with Empire’s customer, Praxair,
15 Inc. (“Praxair”), the Company and Praxair have negotiated a new contract which
16 in part calls for Empire to submit to the Commission a proposed tariff sheet
17 designed to modify the language in Schedule SC-P (the “SC-P Tariff”). The new
18 contract is attached as Schedule JRL-1 to this testimony. The proposed tariff
19 sheet is attached as Schedule JRL-2.

1 **Q. WHEN DID THE PRIOR PRAXAIR CONTRACT EXPIRE?**

2 A. As explained at page 8, lines 24 to 28, of the direct testimony of Empire witness,
3 Kelly A. Emanuel, the prior contract for power service between Empire and
4 Praxair expired on October 31, 2010. As a consequence, the SC-P Tariff was no
5 longer available to Praxair after that date unless the parties entered into a new
6 contract for power service. That has now occurred, and the new contract is
7 effective as of November 1, 2010.

8 **Q. IS EMPIRE PROPOSING ANY CHANGES TO THE SC-P TARIFF,**
9 **SCHEDULE JRL-2, AS A RESULT OF THE NEW CONTRACT WITH**
10 **PRAXAIR?**

11 A. Yes. First, Empire proposes that the maximum number of hours of interruption
12 per year be reduced from 400 hours to 100 hours.

13 **Q. IS THE 100 HOURS OF INTERRUPTION IN THE TARIFF CONSISTENT**
14 **WITH THE NUMBER OF HOURS EMPIRE HAS HISTORICALLY**
15 **INTERRUPTED PRAXAIR?**

16 A. Yes, the 100 hours is consistent with recent past practice. The following table
17 provides the number of hours Empire has interrupted Praxair over the last three
18 years.

Year	Hours Interrupted
2009	34
2008	49
2007	84

19

20 **Q. ARE THERE ANY OTHER PROPOSED CHANGES TO THE TARIFF AS**

1 **A RESULT OF THE NEW CONTRACT?**

2 A. Yes. Empire proposes to also modify the tariff to permit the maximum Firm
3 Demand and Customer Peak Demand to automatically adjust two times during
4 each year (one time on October 1 and one time on April 1) without changing the
5 Interruptible Demand. Another proposed change places an overall limit of
6 thirteen days on the number of days of curtailment per contract year. In addition,
7 the tariff places a limit on the number of hours of curtailment in any single day to
8 no more than 8 hours per day.

9 **Q. IS THIS LATTER PROPOSED CHANGE CONSISTENT WITH PAST**
10 **PRACTICES?**

11 A. Yes, the most days Empire has interrupted Praxair in any given year over the past
12 three years is 12 days. And the most hours per day Empire has interrupted Praxair
13 in any given day is 10 hours.

14 **Q. DOES THE NEW CONTRACT CONTEMPLATE WHAT HAPPENS IF**
15 **THE PROPOSED CHANGES TO THE TARIFF ARE NOT APPROVED**
16 **BY THE COMMISSION?**

17 A. Yes. The new contract provides that if the proposed tariff modifications are not
18 “seasonably” approved by the Commission, Praxair shall have the option to
19 continue the new contract without the tariff modifications or terminate the
20 contract on not less than 12 months notice to the Company.

21 **Q. ARE THERE ANY OTHER PROPOSED REVISIONS TO THE SC-P**
22 **TARIFF?**

23 A. Yes. In a post-filing review of the SC-P tariff sheets initially filed in this rate case

1 on September 28, 2010, we noted the Substation Facilities Charge had been
2 erroneously omitted. Empire has corrected the tariff for this omission by
3 including a Substation Facilities Charge in the SC-P Tariff now being proposed.

4 **Q. DO THE CHANGES TO THE SC-P TARIFF BEING PROPOSED AT**
5 **THIS TIME HAVE ANY IMPACT ON EMPIRE'S OVERALL REVENUE**
6 **REQUIREMENT IN THIS CASE?**

7 A. No.

8 **Q. DOES THIS COMPLETE YOUR SUPPLEMENTAL DIRECT**
9 **TESTIMONY?**

10 A. Yes, it does.