

Exhibit No.:
Issue: *Fuel Adjustment Clause*
Witness: *Brooke Mastrogiannis*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2019-0374*
Date Testimony Prepared: *March 9, 2020*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENERGY RESOURCES DEPARTMENT

REBUTTAL TESTIMONY

OF

BROOKE MASTROGIANNIS

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2019-0374

Jefferson City, Missouri
March 2020

1 **REBUTTAL TESTIMONY OF**

2 **BROOKE MASTROGIANNIS**

3 **THE EMPIRE DISTRICT ELECTRIC COMPANY**

4 **CASE NO. ER-2019-0374**

5 Q. Please state your name and business address.

6 A. My name is Brooke Mastrogiannis. My business address is 200 Madison Street,
7 P.O. Box 360, Jefferson City, Missouri 65102.

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

9 A. I am employed by the Missouri Public Service Commission (“Commission”) as a
10 Utility Regulatory Auditor IV.

11 Q. Are you the same Brooke Mastrogiannis who has previously provided testimony
12 in this case?

13 A. Yes. I contributed to the *Staff Direct Report (Public and Confidential)*,
14 *Appendix 1 and Appendix 2 (Public and Confidential)* (“COS Report”) filed on January 15, 2020,
15 and I contributed to the *Staff Direct Report - Class Cost of Service (Public and Confidential)*,
16 *Appendix 1, Appendix 2 (Public and Confidential) and Appendix 3* (“CCOS Report”)
17 filed on January 29, 2020. I also provided Revenue Requirement rebuttal testimony filed on
18 March 3, 2020.

19 **EXECUTIVE SUMMARY**

20 Q. What is the purpose of your Rate Design/Class Cost of Service rebuttal testimony?

21 A. The purpose of my Rate Design/Class Cost of Service rebuttal testimony is to
22 address Empire witness Aaron Doll’s proposal to add in subsections for auction revenue rights
23 and transmission congestion rights in Empire’s FAC tariff. I will also propose one revision to the
24 Company’s proposed modifications to the FAC tariff.

1 **FUEL ADJUSTMENT CLAUSE**

2 Q. What tariff revisions proposed by the Company does Staff oppose?

3 A. The Company has proposed to exclude language in its red-lined tariff 1st Revised
4 Sheet No. 17x that currently states, “and provided further, should the SPP or another market
5 participant implement a new charge type, exclusive of changes in transmission revenues, not
6 included the Stipulation and Agreement, Schedule E, “List of Sub Accounts Included and
7 Excluded for FAC” approved by Commission order in Case No. ER-2016-0023.” Staff does not
8 agree with taking this language out of the FAC tariff, and recommends keeping this language
9 included. Staff proposes that the new language would state “...approved by Commission order
10 in Case No. ER-2019-0374”.

11 Q. What does Staff suggest as an alternative if the Commission approves removing
12 the language from the tariff?

13 A. Staff recommends that the current Schedule E “List of Sub Accounts Included and
14 Excluded for the FAC” be attached to the tariff submitted in compliance with the result of this
15 case.

16 Q. Does Staff support the Company’s proposed tariff change to include subsections
17 for auction revenue rights and transmission congestion rights in the FAC tariff and base factor
18 calculation?

19 A. Yes. Staff agrees that these subsections should be included in the tariff sheet as
20 the Company has added as subsections on 1st Revised Sheet No. 17w and also the base factor
21 calculation.

22 Q. Does this conclude your rebuttal testimony?

23 A. Yes, it does.

