Exhibit No.: Issue: Fuel Ad Witness: Brooke Sponsoring Party: MoPSC Type of Exhibit: Rebuttal Case No.: ER-2019 Date Testimony Prepared: March 9

Fuel Adjustment Clause Brooke Mastrogiannis MoPSC Staff Rebuttal Testimony ER-2019-0374 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.

Rebuttal Testimony of Brooke Mastrogiannis

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FUEL ADJUSTMENT CLAUSE

2

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

3 The Company has proposed to exclude language in its red-lined tariff 1st Revised A. 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".

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12

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

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

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

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

Q. Does this conclude your rebuttal testimony?

23

A.

22

Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric Company's Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area

Case No. ER-2019-0374

AFFIDAVIT OF BROOKE MASTROGIANNIS

SS.

)

STATE OF MISSOURI)	
)	
COUNTY OF COLE)	

COMES NOW BROOKE MASTROGIANNIS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

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 54 day of March 2020.

-	D. SUZIE MANKIN
	Notary Public - Notary Seal
	State of Missouri
	Commissioned for Cole County
M	ly Commission Expires December 12, 2020
	Commission Number: 12412070

Notary Public