
From: Vuylsteke, Diana

Sent: Thursday, March 21, 2013 08:21 PM

To: 'Kelly Walters' <kwalters@empiredistrict.com>

Subject: Missouri Industrial Energy Consumers' First Data Request to Empire District Electric Company, Missouri PSC
Case No. EW-2013-0425

Kelly, attached is the MIEC's First Data Request in the above-referenced case . Please let me know if you have any questions. Thanks, Diana

3/21/2013

Case No. EW-2013-0425

**Missouri Industrial Energy Consumers'
First Set of Data Requests to Empire District Electric Company**

Item No.	Description
MIEC 1-1.	Please provide a copy of the Company's electric utility construction budget for five years or such longer period of time for which the information is available. Please provide anticipated construction expenditures by year, by function and by subfunction, identifying all individual projects with a capital expenditure of more than \$5 million, and designating the dollars as for replacement or for new infrastructure. Please also identify the expected dollars added to plant in-service by month and retirements by month.
MIEC 1-2.	Please describe the process by which the Company's electric utility construction budget is developed. Please include the participants, the time line, the criteria for offering projects, and the basis for determining the anticipated capital expenditures.
MIEC 1-3.	Please describe the criteria applied to select projects from among the candidate projects and explain whether and how each of the criteria would be modified if the latest versions of Senate Bill 207 and House Bill 398 were legally in effect, with as much specificity as possible..
MIEC 1-4.	Please identify and describe elements of the Company's electric utility infrastructure that need to be replaced because of safety concerns, reliability concerns, or other concerns, and identify which these concerns is applicable to each element of the system. Please identify which if any of these elements need to be replaced in the immediate or near term. If expenditures to address these concerns are not included in the construction budget, please explain.
MIEC 1-5.	Please identify by function, subfunction and major project, the additional dollars by year for the construction expenditures, plant in-service additions and retirements, that the Company would pursue if the infrastructure surcharge provisions of the most recent versions Senate Bill 207 and House Bill 398 were available. Describe the process and criteria to select these projects. Please also quantify the additional revenue requirement by function and subfunction, by year, and the expected timing of rate changes.
MIEC 1-6.	Does the Company contend that it is financially incapable of funding at reasonable cost the additional projects that it would pursue if it had the surcharge? If so, please explain the basis for this contention.
MIEC 1-7.	Has the Company failed to provide safe and adequate service on a reliable basis to its customers because current Missouri statutes do not include Senate Bill 207 and House Bill 398 or equivalent legal authority allowing an infrastructure surcharge for plant additions? If yes, provide specific examples.
MIEC 1-8.	If an infrastructure surcharge is allowed, how would customers know whether the surcharge is being used for additional investments, or providing a benefit that would not otherwise have been received absent the surcharge? In answering this question, please also address periods of time beyond the end of the current construction budgets.