

EXHIBIT

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Data Center
Missouri Public
Service Commission

Exhibit No.: OPC011
Issue(s): Riverton 12 Long-Term Maintenance
Contract Tracker (LTM)
Witness/Type of Exhibit: Roth/Rebuttal
Sponsoring Party: Public Counsel
Case No.: ER-2016-0023

REBUTTAL TESTIMONY

OF

KERI ROTH

Submitted on Behalf of the Office of the Public Counsel

EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2016-0023

May 2, 2016

OPC Exhibit No. 11
Date 6-2-16 Reporter KRF
File No. ER-2016-0023

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**


In the Matter of The Empire District)
Electric Company's Request for)
Authority to Implement a General) Case No. ER-2016-0023
Rate Increase for Electric Service)

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Keri Roth, of lawful age and being first duly sworn, deposes and states:

1. My name is Keri Roth. I am a Public Utility Accountant III for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.




Keri Roth
Public Utility Accountant III

Subscribed and sworn to me this 27th day of April 2016.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August, 2017.

REBUTTAL TESTIMONY
OF
KERI ROTH
EMPIRE DISTRICT ELECTRIC COMPANY
CASE NO. ER-2016-0023

1 **I. INTRODUCTION**

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

3 A. Keri Roth, P.O. Box 2230, Jefferson City, Missouri 65102-2230.

4 **Q. Are you the same Keri Roth who has filed direct testimony in this case?**

5 A. Yes.

6 **Q. What is the purpose of your rebuttal testimony?**

7 A. The purpose of this rebuttal testimony is to respond to direct testimony from Empire District
8 Electric Company ("Empire") regarding the Riverton 12 long-term maintenance contract
9 tracker ("LTM").

10
11 **II. RIVERTON 12 LONG-TERM MAINTENANCE CONTRACT**
12 **TRACKER**

13 **Q. Is Empire requesting additional changes to the Riverton 12 LTM?**

14 A. Yes. On page 6 of Mr. John M. Woods' testimony, he suggests setting up a tracker for all
15 non-labor operations and maintenance expense costs ("O & M") for the Riverton 12
16 Combined Cycle Unit.

17 **Q. What do non-labor O & M expenses include usually?**

1 A. Non-labor O & M expenses may include, but not be limited to, maintenance of electric
2 control system, turbines, generators, and safety expenditures. My basis for this derives from
3 my understanding of utility operations from an accountancy perspective only. I do not
4 purport to explain this from any perspective of an engineer or other technical expert.

5 **Q. Does OPC support the Riverton 12 LTM tracker?**

6 A. Yes. This is discussed in my direct testimony on page 15, lines 20 – 21.

7 **Q. Has OPC determined which non-labor O & M accounts should be tracked under the**
8 **tracker?**

9 A. No. It is OPC's understanding, based on discussion during the technical conference held on
10 April 19 of this year, Empire will provide a list of non-labor O & M accounts to OPC and
11 the Missouri Public Service Commission Staff they wish to include in the tracker. OPC will
12 review the list of accounts and provide a recommendation in surrebuttal.

13 **Q. Does this conclude your rebuttal testimony?**

14 A. Yes.