

Missouri Public Service Commission

Respond Data Request

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 Data Center
 Missouri Public
 Service Commission

Data Request No.	0585
Company Name	MO PSC Staff-(All)
Case/Tracking No.	ER-2014-0258
Date Requested	2/11/2015
Issue	Other - Other
Requested From	Sarah Kliethermes
Requested By	Diana M Vuylsteke
Brief Description	Surrebuttal testimony
Description	5.12 - Please provide a table similar to the table appearing in the surrebuttal testimony of Sarah L. Kliethermes on page 20 between lines 15 and 16 which compares Staff's Detailed BIP Production capacity allocator to the production capacity allocators provided in response to Question Nos. 10 and 11 above.
Response	- See Attachment -
Objections	NA

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission if, during the pendency of Case No. ER-2014-0258 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the MO PSC Staff-(All) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to MO PSC Staff-(All) and its employees, contractors, agents or others employed by or acting in its behalf.

Security :	Public
Rationale :	NA

MIE Exhibit No. 523
 Date 3-04-15 Reporter AF
 File No ER-2014-0258

ER-2014-0258

Response to 0585: The allocator described in Question 10 (0582) is not mathematically possible. The table below compares the Production Allocator with and without including the rate base associated with the Sioux Scrubber from the allocator development.

	Residential	SGS	LGS/SPS	LPS	LTS	Lighting	Total
Allocator Percent Difference	0.8690%	0.5432%	-0.3730%	-1.8599%	-2.7165%	-2.7165%	
Allocator Difference	0.397%	0.057%	-0.108%	-0.139%	-0.196%	-0.011%	
No Sioux Adjustment Capacity Allocator	45.66%	10.42%	28.84%	7.48%	7.22%	0.39%	
No Sioux Adjustment Production Capacity Allocation	\$ 2,390,224,138	\$ 545,519,554	\$ 1,509,666,537	\$ 391,332,890	\$ 378,206,953	\$ 20,246,755	\$ 5,235,196,826
Staff Detailed BIP Production Capacity Allocator	45.26%	10.36%	28.94%	7.61%	7.42%	0.40%	
Staff Detailed BIP Production Capacity Allocation	\$ 2,369,453,734	\$ 542,556,471	\$ 1,515,297,507	\$ 398,611,477	\$ 388,480,882	\$ 20,796,755	\$ 5,235,196,826
Allocated Cost Difference	\$ 20,770,404	\$ 2,963,083	\$ (5,630,970)	\$ (7,278,587)	\$ (10,273,929)	\$ (550,000)	\$ (0)
Percent Allocated Cost Difference	0.8766%	0.5461%	-0.3716%	-1.8260%	-2.6446%	-2.6446%	0.0000%