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Witness: Natelle Dietrich
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Case No.: EO-2019-0132 and
EO-2019-0133
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

REBUTTAL TESTIMONY

OF

NATELLE DIETRICH

**KANSAS CITY POWER & LIGHT COMPANY
CASE NO. EO-2019-0132**

AND

**KCP&L GREATER MISSOURI OPERATIONS COMPANY
CASE NO. EO-2019-0133**

*Jefferson City, Missouri
August 2019*

1
2 **REBUTTAL TESTIMONY**

3 **OF**

4 **NATELLE DIETRICH**

5 **KANSAS CITY POWER & LIGHT COMPANY**
6 **CASE NO. EO-2019-0132**

7 **AND**

8 **KCP&L GREATER MISSOURI OPERATIONS COMPANY**
9 **CASE NO. EO-2019-0133**

10 Q. Please state your name and business address.

11 A. My name is Natelle Dietrich. My business address is 200 Madison Street,
12 Jefferson City, MO 65101.

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

14 A. I am employed by the Missouri Public Service Commission (“Commission”) as
15 Commission Staff Director.

16 Q. Please describe your education and relevant work experience.

17 A. I received a Bachelor’s of Arts Degree in English from the University of
18 Missouri, St. Louis, and a Master’s of Business Administration from William Woods
19 University. During my tenure with the Commission, I have worked in many areas of
20 telecommunications regulation. In October, 2007, I became the Director of Utility Operations.
21 The division was renamed the Tariff, Safety, Economic and Engineering Analysis
22 Department in August 2011. In October 2015, I assumed my current position as Commission
23 Staff Director. In this position, I oversee all aspects of the Commission Staff.

24 My responsibilities include involvement in several activities related to
25 implementing sound energy policy in Missouri, including relevant activities related to energy

1 efficiency, demand-side management, demand response and smart grid. I was the lead director
2 for the Commission's rulemakings on such things as the implementation of the Missouri Energy
3 Efficiency Investment Act ("MEEIA"), the Chapter 22 rewrite, and the Commission's
4 renewable energy standard regulations. I was a member of the Missouri Delegation to the
5 Missouri/Moldova Partnership through NARUC and the US Agency for International
6 Development.

7 I am a member of the National Association of Regulatory Utility Commissioners
8 Subcommittee on Rate Design and the Staff Subcommittee on Telecommunications. I serve on
9 the Staff of the Federal/State Joint Board on Universal Service, serve as lead Staff for the
10 Missouri Universal Service Board, and was a member of the Governor's MoBroadbandNow
11 taskforce.

12 Q. Have you previously testified before the Commission?

13 A. Yes. My Case Summary is attached as Schedule ND-r1.

14 **EXECUTIVE SUMMARY**

15 Q. What is the purpose of your testimony?

16 A. The purpose of my testimony is to sponsor Staff's Rebuttal Report ("Report")
17 that is being filed concurrently with this testimony and provide an overview of Staff's position
18 in this proceeding.

19 Q. Please briefly describe the Application to Approve DSIM Filing, Request for
20 Variances, and Motion to Adopt Procedural Schedule and MEEIA Cycle 3 2019-2022 Filing
21 ("Application") filed by Kansas City Power & Light Company ("KCPL") and KCP&L Greater
22 Missouri Operations Company ("GMO") (collectively, "the Companies" or "KCPL/GMO") in
23 File Nos. EO-2019-0132 and EO-2019-0133, on November 29, 2018.

1 A. In its November 2018 Application, the Companies sought approval of various
2 demand-side programs, a Technical Resource Manual (“TRM”), and a Demand-Side
3 Investment Mechanism (“DSIM”) (“MEEIA Cycle 3”). The Companies propose to invest
4 \$96.3 million to achieve 185.9 MW of capacity reduction and 343.7 GWh of first year annual
5 energy savings¹. KCPL and GMO proposed separate demand-side portfolios that contain the
6 same programs² but differ in proposed energy and demand savings targets and budgets.

7 On February 15, 2019, the Companies, Staff, the Office of the Public Counsel (“OPC”),
8 the Missouri Department of Economic Development – Division of Energy (“DE”), and Renew
9 Missouri Advocates d/b/a Renew Missouri (“Renew MO”) (collectively, “Signatories”) filed a
10 Stipulation and Agreement to continue the KCPL and GMO MEEIA Cycle 2 programs with
11 certain modifications (“Cycle 2 Continuation Agreement”) while the Signatories continued
12 settlement discussions. The Commission approved the Cycle 2 Continuation Agreement on
13 February 27, 2019. On July 24, 2019, the Signatories, along with the National Housing Trust
14 (“NHT”), filed a motion to re-establish procedural schedule (“Procedural Schedule Joint
15 Motion”). The Procedural Schedule Joint Motion indicated it was appropriate to re-establish
16 the procedural schedule “to resolve all issues related to the [Companies] MEEIA [Cycle] 3
17 programs as filed on November 29, 2018, including avoided costs.”

18 Most of the programs in the November 2018 Application were proposed to cover the
19 period April 1, 2019 through March 31, 2022, but the Income-Eligible Multi-Family (“IEMF”)
20 program was proposed to run through March 31, 2025. In its Application, KCPL/GMO
21 indicates the portfolio will generate an anticipated \$152 million in net present value of net

¹ These numbers are based on an Application filed in November 2018, with program implementation to begin April 2019. In its Analysis, Staff discounted all dollars to 2019 to provide Staff’s estimates of MEEIA Cycle 3 net benefits.

² The only exception is that KCPL has proposed an Income Eligible Home Energy Report.

1 benefits for customers. In addition, KCPL/GMO identifies the following principle elements of
2 MEEIA Cycle 3: recovery of program costs and offset of the throughput disincentive at the
3 same time energy efficiency investments are made and an opportunity to earn an incentive
4 amount based upon demand and energy savings achieved.

5 In its Application, KCPL/GMO also requests a variance from 4 CSR 240-20.092(1)(C),
6 the definition of “avoided cost”, noting:

7 While we have always interpreted this rule to mean the methodology
8 for calculating avoided costs and therefore shared benefits would be
9 consistent with the most recently filed IRP at the time of the MEEIA
10 filing, out of an abundance of caution, this variance is being
11 requested. Good cause exists for the request as it adds another layer
12 of uncertainty that further discourages our company from its ability
13 to support state policy to value demand-side sources and supply
14 resources equivalently.

15 Q. The Procedural Schedule Joint Motion indicates it is appropriate to reinstate a
16 procedural schedule using the November 2018 Application. Did KCPL/GMO update its
17 Application from its November 2018 filing?

18 A. No. On July 12, 2019, Staff submitted Data Request (“DR”) No. 0135 asking
19 the Companies to “describe in detail all known changes from the MEEIA [C]ycle 3
20 [Application] that was filed 11/29/18 to now, including but not limited to, proposed program
21 design, proposed program budgets, and proposed savings targets”. On July 29, 2019, the
22 Companies responded, “To date the Company has not made any filings to update or change
23 programs, budgets or savings targets from the 11/29/18 filing.” Further, no filings or updates
24 have been provided since the July 29, 2019 response.

1 Q. What is Staff's recommendation on the Application?

2 A. As more fully explained in the Report, Staff recommends the Commission reject
3 the Application. Section 393.1075.3 of MEEIA states, "It shall be the policy of the state to
4 value demand-side investments equal to traditional investments in supply and delivery
5 infrastructure and allow recovery of all reasonable and prudent costs of delivering cost-effective
6 demand-side programs." The MEEIA statute provides further guidance in subsection 4, where
7 it states, "[r]ecover for such programs shall not be permitted unless the programs...are
8 beneficial to all customers in the customer class in which the programs are proposed, regardless
9 of whether the programs are utilized by all customers". Based on its analysis as discussed in
10 the Report, and upon advisement of Staff Counsel, Staff suggests the Application does not
11 comply with the statutory requirements of MEEIA. Therefore, Staff's ultimate recommendation
12 is to reject the Application.

13 However, Staff acknowledges there are public policy reasons to support DSM and
14 demand response so Staff also provides a couple alternatives to outright rejection. Staff also
15 provides the Commission with proposed conditions should the Commission determine it is
16 appropriate to approve the Application.

17 Q. Please summarize Staff's analysis as provided in the Report.

18 A. Staff witness J Luebbert provides analysis of avoided costs and avoided cost
19 benefits for KCPL, GMO and KCPL/GMO, which demonstrate that KCPL and GMO avoided
20 cost assumptions contain several fundamental flaws that artificially attribute avoided costs
21 savings for all demand-side measures even when there will not be actual avoided cost savings
22 for many years.

1 Staff explains that because of the Joint Network Integrated Transmission Service
2 Agreement (“NITS”) approved by the Southwest Power Pool (“SPP”), KCPL and GMO should
3 be considered a combined company for purposes of analyzing avoided capacity cost benefits
4 and avoided transmission cost benefits, and ultimately the benefits to all customers including
5 non-participants. This aggregation of assets demonstrates that KCPL/GMO does not need
6 to invest in additional supply-side resources until 2033 and 2036 on a combined basis.
7 Further, KCPL/GMO will need to invest in those same supply-side resources in 2033 and 2036
8 regardless of the implementation of MEEIA Cycle 3. Staff’s analysis demonstrates
9 KCPL/GMO does not avoid any supply-side investment through implementation of MEEIA
10 Cycle 3; therefore, KCPL/GMO should have assumed an avoided capacity cost equal to zero
11 for demand savings associated with demand-side resources associated with MEEIA Cycle 3,
12 and for MEEIA Cycle 3 program evaluation.

13 Mr. Luebbert also reviewed KCPL/GMO’s capacity needs to meet the Southwest Power
14 Pool (“SPP”) resource adequacy requirements, noting that although additional capacity
15 purchases may be needed in 2032, MEEIA Cycle 3 still will not yield any avoided capacity cost
16 benefits to customers before 2032. Finally, Mr. Luebbert analyzed potential SPP administrative
17 costs that may be avoided by MEEIA Cycle 3, but determined that any avoided SPP
18 administrative costs would be minimal. In short, the inclusion of avoided costs without
19 potential deferral of supply-side resources inflates the value of demand-side resources and
20 makes programs appear to be cost-effective based on saving estimates that will not be realized
21 by customers.

22 Commission rule 4 CSR 20.092(1)(C) presumes that absent demand-side programs, the
23 utility would have to invest in a new supply-side resource or continue to invest in existing

1 supply-side resources in order to serve customer needs.³ KCPL/GMO requests a variance from
2 this rule. However, merely granting a waiver of a Commission rule does not alleviate the
3 statutory requirements that are at the root of Staff’s concerns as outlined in this testimony and
4 Staff’s Report.

5 Staff witness John A. Rogers provides analysis of costs and benefits. When properly
6 calculating discounted costs and benefits for MEEIA Cycle 3, Staff’s analysis demonstrated
7 that: KCPL is expected to have a net present value (“NPV”) of net benefits of \$3.6 million;
8 GMO is expected to have a NPV of net benefits of \$(9.2) million; and KCPL/GMO is expected
9 to have a NPV of \$(5.7) million net benefits. In other words, GMO and KCPL/GMO
10 customers will have net costs of \$9.2 million and \$5.7 million, respectively, as a result of
11 MEEIA Cycle 3.

12 Mr. Rogers explains that program costs, TD and EO will be collected for all customers
13 contemporaneously and with certainty, while program benefits are uncertain, difficult to
14 quantify, and not realized until sometime in the future. Mr. Rogers concludes that
15 non-participants are expected to receive no net benefits from MEEIA Cycle 3 because avoided
16 energy cost benefits only flow to participants and there are expected to be no avoided capacity
17 cost benefits for customers (participants and non-participants). Therefore, the Application
18 drastically overstates net benefits for customers, thus failing to provide benefits to those
19 customers who do not participate.⁴

³ The avoided cost analysis demonstrate that the Application does not meet the rule or statutory requirement to value demand-side investments equal to traditional investments in supply and delivery infrastructure.

⁴ Section 393.1075.4 states, “...Recovery for such programs shall not be permitted unless the programs are approved by the commission, result in energy or demand savings and are beneficial to all customers in the customer class in which the programs are proposed, regardless of whether the programs are utilized by all customers.”

1 Staff witness Tammy Huber reviewed potential societal benefits, recognizing there are
2 societal benefits attributable to energy efficiency. KCPL/GMO, in Appendix 8.2 of MEEIA
3 Cycle 3, identified barriers for participation, including customer knowledge of benefits for
4 efficient products, quickly changing technologies, customer understanding, perceived high
5 initial costs, limited contractor knowledge or experience, product replacement only on failure,
6 and lack of financial incentive. Staff recommends KCPL/GMO continue to work with
7 evaluators and program implementers to collect additional data on customer participation and
8 preferences. Staff further recommends KCPL/GMO continue to educate its customers on
9 programs.

10 Ms. Huber points out that, in addition to societal benefits, KCPL/GMO anticipates
11 14 full-time employees to implement and deliver DSM programs in Missouri. KCPL/GMO
12 indicates the money spent in Missouri will have a direct and indirect impact, creating value to
13 customers – both participants and non-participants; however, even considering these benefits,
14 the benefits do not off-set the issues and concerns Staff identifies with the Application.

15 The MEEIA statute also requires “cost-effective demand-side programs”. Staff witness
16 Brad J. Fortson compares the “cost-effectiveness” of the Application to Staff’s adjusted avoided
17 costs and avoided cost benefits. Using Staff’s avoided costs and avoided cost benefits, only
18 one KCPL and one GMO residential program and two KCPL and two GMO business programs
19 have a Total Resource Cost (“TRC”) test ratio greater than 1.⁵ Further, when reviewing the
20 TRC at the portfolio level, the residential portfolio for KCPL drops below 1.00 and both the

⁵ 4 CSR 240-20.094(I) states, “The commission shall consider the TRC test a preferred cost-effectiveness test. For demand-side programs and program plans that have a TRC test ratio greater than one (1), the commission shall approve demand-side programs or program plans, budgets, and demand and energy savings targets for each demand-side program it approves, provided it finds that the utility has met the filing and submission requirements of this rule and the demand side programs...”

1 Residential and Business portfolios for GMO drop below 1.00, again demonstrating the
2 portfolios are not expected to be beneficial to all customers. Mr. Luebbert suggests the Utility
3 Cost Test (“UCT”) provides a better view of whether or not demand response programs are
4 actually cost effective, and recommends it be the primary cost effectiveness test for demand
5 response evaluation purposes if MEEIA Cycle 3 demand response programs are approved.

6 Mr. Fortson and Mr. Luebbert also discuss issues with the design of the proposed
7 demand-side programs and make recommendations related to those programs. For instance, it
8 is Staff’s understanding that KCPL/GMO has or is working on at least three tools that provide
9 similar information to the customer about their usage and ways the customer can reduce or shift
10 their energy use. It is not clear to Staff which of the tools are recovered in base rates and which,
11 other than the Home Energy Report, may be recovered through MEEIA. Additionally,
12 KCPL/GMO has not indicated how the utilization of information from Automated Meter
13 Infrastructure meters will benefit the evaluation of savings from these tools as well as other
14 measures.

15 These are just a few of the points, specific to statutory and rule requirements, which
16 Staff raises in its Report. For these reasons, in addition to the concerns and issues identified in
17 the Report, Staff recommends the Commission reject the Application.

18 In rejecting the Application, the Commission could indicate it would be open to further
19 review of KCPL/GMO’s Application if KCPL/GMO were to restructure its Application to
20 address Staff’s concerns, by reducing the MEEIA portfolio to include only low-income
21 programs, education programs absent Home Energy Reports, and restructured demand response

Rebuttal Testimony of
Natelle Dietrich

1 programs. Staff offers recommendations and conditions should the Commission determine the
2 Application could be modified.⁶

3 It should also be noted that KCPL/GMO is able to offer its DSM portfolio
4 outside MEEIA.

5 Q. Does this conclude your testimony?

6 A. Yes.

⁶ 4 CSR 240-20.094(H) states, "...The commission shall approve, approve with modification acceptable to the electric utility, or reject such applications for approval of demand-side program plans within one hundred twenty (120) days of the filing of an application under this section only after providing the opportunity for a hearing."

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an) Case No. EO-2019-0132
Application for Authority to Establish a)
Demand-Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri)
Operations Company's Notice of Intent to File) Case No. EO-2019-0133
an Application for Authority to Establish a)
Demand-Side Programs Investment Mechanism)

AFFIDAVIT OF NATELLE DIETRICH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW NATELLE DIETRICH 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.


NATELLE DIETRICH

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 16th day of August 2019.

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


Notary Public

Natelle Dietrich
Case Summary

Presented testimony or analysis through affidavits on the following cases and proceedings:

- Case No. TA-99-405, an analysis of the appropriateness of a “payday loan” company providing prepaid telecommunications service.
- Case No. TX-2001-73, In the Matter of Proposed New Rules on Prepaid Calling Cards.
- Case No. TO-2001-455, the AT&T/Southwestern Bell Telephone Company arbitration, which included issues associated with unbundled network elements.
- Case No. TX-2001-512, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-33.010, 33.020, 33.030, 33.040, 33.060, 33.070, 33.080, 33.110, and 33.150 (telecommunications billing practices).
- Case No. TO-2002-222, the MCI/SWBT arbitration.
- Case No. TR-2002-251, In the Matter of the Tariffs Filed by Sprint Missouri, Inc. d/b/a Sprint to Reduce the Basic Rates by the Change in the CPI-TS as Required by 392.245(4), Updating its Maximum Allowable Prices for Non-Basic Services and Adjusting Certain Rates as Allowed by 392.245(11) and Reducing Certain Switched Access Rates and Rebalancing to Local Rates as Allowed by 392.245(9).
- Case No. TX-2002-1026, In the Matter of a Proposed Rulemaking to Implement the Missouri Universal Service Fund End-User Surcharge.
- Case No. TX-2003-0379, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-3.545, formerly 4 CSR 240-30.010 (tariff filing requirements).
- Case No. TX-2003-0380, In the Matter of Proposed Amendments to Commission Rules 4 CSR 240-2.060, 4 CSR 240-3.020, 4 CSR 240-3.510, 4 CSR 240-3.520, and 4 CSR 240-3.525 (competitive local exchange carrier filing requirements and merger-type transactions).
- Case No. TX-2003-0389, In the Matter of Proposed Amendment to Commission Rules 4 CSR 240-3.530 and 4 CSR 240-3.535, and New Rules 4 CSR 240-3.560 and 4 CSR 240-3.565 (telecommunications bankruptcies and cessation of operation).
- Case No. TX-2003-0445, In the Matter of a Proposed New Rule 4 CSR 240-33.160 Regarding Customer Proprietary Network Information.
- Case No. TX-2003-0487, In the Matter of Proposed Commission Rules 4 CSR 240-36.010, 36.020, 36.030, 36.040, 36.050, 36.060, 36.070, and 36.080 (arbitration and mediation rules).
- Case No. TX-2003-0565, In the Matter of a Proposed Rulemaking to Codify Procedures for Telecommunications Carriers to Seek Approval, Amendment and Adoption of Interconnection and Resale Agreements.
- Case Nos. TX-2004-0153 and 0154, in the Matter of Proposed Rule for 211 Service (emergency and permanent rules).
- Case Nos. TO-2004-0370, IO-2004-0467, TO-2004-0505 et al, In the Matter of the Petition of various small LECs for Suspension of the Federal Communications Commission Requirement to Implement Number Portability.

- Case No. TX-2005-0258, In the Matter of a New Proposed Rule 4 CSR 240-33.045 (placement and identification of charges on customer bills).
- Case No. TX-2005-0460, In the Matter of the Proposed Amendments to the Missouri Universal Service Fund Rules.
- Case No. TO-2006-0093, In the Matter of the Request of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, for Competitive Classification Pursuant to Section 392.245.6, RSMo (2205) – 30-day Petition.
- Case Nos. TC-2005-0357, IR-2006-0374, TM-2006-0306, the complaint case, earnings investigation and transfer of assets case to resolve issues related to Cass County Telephone Company, LP, LEC Long Distance, FairPoint Communications, Inc., FairPoint Communications Missouri Inc. d/b/a FairPoint Communications and ST Long Distance Inc. db/a FairPoint Communications Long Distance.
- Case No. TC-2006-0068, FullTel, Inc., v. CenturyTel of Missouri, LLC.
- Case No. TX-2006-0169, In the Matter of Proposed New Rule 4 CSR 240-3.570 Regarding Eligible Telecommunications Carrier Designations for Receipt of Federal Universal Service Fund Support.
- Case No. TX-2006-0429, In the Matter of a Proposed Amendment to 4 CSR 240-3.545 (one day tariff filings).
- Case No. TX-2007-0086, In the Matter of a Proposed Rulemaking to Create Chapter 37 – Number Pooling and Number Conservation Efforts
- Case No. TA-2009-0327, In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households.
- Case No. RA-2009-0375, In the Matter of the application of Nexus Communications, Inc. dba TSI for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households.
- Case No. AX-2010-0061, Office of Public Counsel’s Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers.
- Case No. GT-2009-0056, In the Matter of Laclede Gas Company’s Tariff Revision Designed to Clarify its Liability for Damages Occurring on Customer Piping and Equipment Beyond the Company’s Meter.
- Case No. ER-2012-0166, In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase Its Revenues for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0174, In the Matter of Kansas City Power & Light Company’s Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0175, In the Matter of KCP&L Greater Missouri Operations Company’s Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0345, In the Matter of Empire District Electric Company of Joplin, Missouri Tariff’s Increasing Rates for Electric Service Provided to

Customers in the Missouri Service Area of the Company. Energy Independence and Security Act of 2007 (EISA).

- File Nos. EO-2013-0396 and EO-2013-0431, In the Matter of the Joint Application of Entergy Arkansas, Inc., Mid South TransCo, LLC, Transmission Company Arkansas, LLC and ITC Midsouth LLC for Approval of Transfer of Assets and Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions; and In the Matter of Entergy Arkansas, Inc.'s Notification of Intent to Change Functional Control of Its Missouri Electric Transmission Facilities to the Midwest Independent Transmission System Operator Inc. Regional Transmission System Organization or Alternative Request to Change Functional Control and Motions for Waiver and Expedited Treatment, respectively.
- Case No. MX-2013-0432, In the Matter of a Proposed Rulemaking to Revise Manufactured Housing Rules Regarding Installation and Monthly Reporting Requirements.
- Case No. TX-2013-0324, In the Matter of a Proposed Rulemaking to the Missouri Universal Service Fund.
- Case No. EO-2014-0095, In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish Demand-Side Programs Investment Mechanism.
- Case No. EA-2014-0207, In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line.
- Case No. ER-2014-0370, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.
- Case No. WR-2015-0301, In the Matter of Missouri-American Water Company's Request for Authority to Implement a General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.
- Case No. ER-2016-0156, In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.
- Case No. ET-2016-0246, In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of a Tariff Setting a Rate for Electric Vehicle Charging Stations.
- Case No. ER-2016-0285, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.
- Case No. ER-2016-0179, In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase its Revenues for Electric Service.
- Case No. EE-2017-0113, In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for a Variance from the Commission's Affiliate Transactions Rule, 4 CSR 240-20.015
- Case No. EA-2016-0358, In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to

- Construct, Own, Operate, Control, Manage and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345kV Transmission Line
- Case No. EM-2017-0226, In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Acquisition of Westar Energy, Inc.
 - Case No. GR-2017-0215, In the Matter of Laclede Gas Company's Request to Increase its Revenues for Gas Service.
 - Case No. GR-2017-0216, In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to increase its Revenues for Gas Service.
 - Case No. WR-2017-0259, In the Matter of the Rate Increase Request of Indian Hills Utility Operating Company, Inc.
 - Case No. WR-2017-0285, In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.
 - Case No. EM-2018-0012, In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.
 - Case No. EO-2018-0092, In the Matter of the Application of The Empire District Electric Company for Approval of Its Customer Savings Plan.
 - Case No. GR-2018-0013, In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company.
 - Case No. ER-2018-0145, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.
 - Case No. ER-2018-0146, In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.
 - Case No. EO-2018-0211, In the Matter of Union Electric Company d/b/a Ameren Missouri's 3rd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA.
 - Case Nos. WM-2018-0116 and SM-2018-0117, In the Matter of the Application of Confluence Rivers Utility Operating Company, Inc. to Acquire Certain Water and Sewer Assets, For a Certificate of Convenience and Necessity, and, in Connection Therewith, To Issue Indebtedness and Encumber Assets.
 - Case No. EA-2019-0010, In the Matter of the Application of The Empire District Electric Company for Certificates of Convenience and Necessity Related to Wind Generation Facilities.
 - Case No. EM-2019-0150, In the Matter of the Joint Application of Invenergy Transmission LLC, Invenergy Investment Company LLC, Grain Belt Express Clean Line LLC and Grain Belt Express Holding LLC for an Order Approving the Acquisition by Invenergy Transmission LLC of Grain Belt Express Clean Line LLC.
 - Case No. WA-2019-0185, In the Matter of the Application of Osage Utility Operating Company, Inc. to Acquire Certain Water and Sewer Assets and for a Certificate of Convenience and Necessity.

- Case No. WA-2019-0299, In the Matter of the Application of Confluence Rivers Utility Operating Company, Inc., for Authority to Acquire Certain Water and Sewer Assets and for a Certificate of Convenience and Necessity.
- Actively participated in or prepared comments on numerous issues on behalf of the Commission to be filed at the Federal Communications Commission.
- Prepared congressional testimony on behalf of the Commission on number conservation efforts in Missouri.
- A principal author on Missouri Public Service Commission Comments on the Reduction of Carbon Emissions in Missouri under Section 111(d) of the Clean Air Act.
- A principal author on Missouri Public Service Commission Comments on the Environmental Protection Agency’s “Emission Guidelines for Existing Stationary Sources: Electric Generating Unity”.

Commission Arbitration Advisory Lead Staff for the following cases:

- Case No. TO-2005-0336, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri’s Petition for Compulsory Arbitration of Unresolved Issues For a Successor Interconnection Agreement to the Missouri 271 Agreement ("M2A").
- Case No. IO-2005-0468, In the Matter of the Petition of Alma Telephone Company for Arbitration of Unresolved Issues Pertaining to a Section 251(b)(5) Agreement with T-Mobile USA, Inc.
- Case No. TO-2006-0147 et al, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with T-Mobile USA, Inc and Cingular Wireless.
- Case No. TO-2006-0299, Petition of Socket Telecom, LLC for Compulsory Arbitration of Interconnection Agreements with CenturyTel of Missouri, LLC and Spectra Communications, LLC, pursuant to Section 251(b)(1) of the Telecommunications Act of 1996.
- Case No. TO-2006-0463, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with ALLTEL Wireless and Western Wireless.
- Case No. TO-2009-0037, In the Matter of the Petition of Charter Fiberlink-Missouri, LLC for Arbitration of an Interconnection Agreement Between CenturyTel of Missouri, LLC and Charter Fiberlink-Missouri, LLC.