Exhibit No.: Issues: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

Report on Cost of Service; Overview of the Staff's Filing; Kimberly K. Bolin MoPSC Staff Direct Testimony WR-2013-0461 November 15, 2013

# MISSOURI PUBLIC SERVICE COMMISSION

## UTILITY SERVICES DIVISION

# **DIRECT TESTIMONY**

## OF

### **KIMBERLY K. BOLIN**

# LAKE REGION WATER AND SEWER COMPANY

# CASE NO. WR-2013-0461

Jefferson City, Missouri November 15, 2013

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1	DIRECT TESTIMONY
2	OF
3	KIMBERLY K. BOLIN
4	LAKE REGION WATER AND SEWER COMPANY
5	CASE NO. WR-2013-0461
6	Q. Please state your name and business address.
7	A. Kimberly K. Bolin, P.O. Box 360, Suite 440, Jefferson City, MO 65102.
8	Q. By whom are you employed and in what capacity?
9	A. I am a Utility Regulatory Auditor for the Missouri Public Service Commission
10	("Commission").
11	Q. Please describe your educational background and work experience.
12	A. I graduated from Central Missouri State University in Warrensburg, Missouri,
13	with a Bachelor of Science in Business Administration, major emphasis in Accounting, in
14	May 1993. Before coming to work at the Commission, I was employed by the Missouri
15	Office of the Public Counsel ("OPC") as a Public Utility Accountant from September 1994 to
16	April 2005. I commenced employment with the Commission in April 2005.
17	Q. What was the nature of your job duties when you were employed by OPC?
18	A. I was responsible for performing audits and examinations of the books and
19	records of public utilities operating within the state of Missouri.
20	Q. Have you previously filed testimony before this Commission?
21	A. Yes, numerous times. Please refer to Schedule KKB-1, attached to this direct
22	testimony, for a list of the major audits in which I have assisted and filed testimony with
23	OPC and with the Commission.

Q. What knowledge, skills, experience, training and education do you have in the
areas of which you are testifying as an expert witness?

A. I have received continuous training at in-house and outside seminars on
technical ratemaking matters both when employed by OPC and since I began my employment
at the Commission. I have been employed by this Commission or by OPC as a Regulatory
Auditor for over 19 years, and have submitted testimony on ratemaking matters numerous
times before the Commission. I have also been responsible for the supervision of other
Commission employees in rate cases and other regulatory proceedings.

9 Q. Have you participated in the Commission Staff's ("Staff") audit of Lake
10 Region Water and Sewer Company ("Lake Region" or "Company") concerning its request for
11 a rate increase in this proceeding?

A. Yes, I have, with the assistance of other members of the Staff. I was
designated as the Staff Case Coordinator for the Utility Services Department in
this proceeding.

15

## EXECUTIVE SUMMARY

Q.

16

What topics are addressed in this piece of testimony?

A. I am sponsoring Staff's Cost of Service Report that is being filed concurrently
with this testimony. As was done in several other recent filings by Staff, a "report" format is
being used to convey Staff's direct case findings, conclusions, and recommendations to the
Commission. The "report" approach to the case filing is an effort to make Staff's filings more
coherent and manageable. Staff believes that, under this approach and without sacrificing the
quality of the evidence presented, fewer witnesses will be required to file direct testimony and
Staff's case will be presented more clearly.

1	I will also provide in my direct testimony an overview of Staff's revenue requirement								
2	determination for Lake Region in this proceeding. Staff has conducted a review of all cost of								
3	service components (capital structure, return on rate base, rate base, depreciation expense and								
4	operating expenses) that comprise Lake Region's revenue requirement. My testimony will								
5	provide an overview of Staff's work in each area.								
6	REPORT ON COST OF SERVICE								
7	Q. Please explain the organizational format of the Staff's Cost of Service								
8	Report ("Report").								
9	A. The Staff's Report has been organized by topic as follows:								
10	I. Executive Summary								
11	II. Background of Lake Region Water and Sewer Company								
12	III. True-Up								
13	IV. Rate of Return								
14	V. Rate Base								
15	VI. Allocations								
16	VII. Income Statement								
17	VIII. Service Quality								
18	This organizational format has been condensed for ease of explanation. The Rate								
19	Base and Income Statement sections have numerous subsections which explain each								
20	specific adjustment made by the Staff to the June 30, 2013 test year. The Staff member								
21	responsible for writing each subsection of the Report is identified in the write-up for								
22	that section. The affidavit of each Staff person who contributed to the Report is included in								

an appendix to the Report.

1	<b>OVERVIEW OF STAFF'S RECOMMENDED REVENUE REQUIREMENT</b>								
2	Q. In its audit of Lake Region for this proceeding, Case No. WR 2013-0461, has								
3	the Staff examined all major cost of service components comprising the revenue requirement								
4	for Lake Region's Shawnee Bend water operations and Shawnee Bend and Horseshoe Bend								
5	sewer operations?								
6	A. Yes.								
7	Q. What are the cost of service components that comprise the revenue								
8	requirement for a regulated utility?								
9	A. The revenue requirement for a regulated utility can be defined by the								
10	following formula:								
11	Revenue Requirement = Cost of Providing Utility Service								
12	or								
13	RR = O + (V - D)R where,								
14	RR = Revenue Requirement								
15	O = Operating Costs ( Payroll, Maintenance, etc.), Depreciation and Taxes								
16	V = Gross Valuation of Property Required for Providing Service								
17 18	D = Accumulated Depreciation Representing Recovery of Gross Property Investment								
19 20	V – D = Rate Base (Gross Property Investment less Accumulated Depreciation = Net Property Investment)								
21	(V - D)R = Return Allowed on Net Property Investment								
22	This is the formula for the utility's total revenue requirement. In the context of								
23	Commission rate cases, the term "revenue requirement" is generally used to refer to the								
24	increase or decrease in revenue a utility needs to be able to provide safe and reliable service as								
25	measured using the utility's existing rates and cost of service.								

2

1

Q. What objectives must be met during the course of an audit of a regulated utility in determining the revenue requirement components you've identified in your last answer?

3

4

A. The objectives required for determining the revenue requirement for a regulated utility can be summarized as follows:

5 1) Selection of a test year. The test year income statement represents 6 the starting point for determining a utility's existing annual revenues, operating costs and 7 net operating income. Net operating income represents the return on investment based 8 upon existing rates. The test year ordered for this case, Case No. WR-2013-0461, is the 9 twelve months ending June 30, 2013. "Annualization" and "normalization" adjustments are 10 made to the test year results when the unadjusted results (test year amounts) do not 11 fairly represent the utility's most current annual level of revenues and operating costs. 12 Examples of annualization and normalization adjustments are explained more fully later 13 in this direct testimony.

14 2) Selection of an "update period." A proper determination of revenue 15 requirement is dependent upon matching the components, rate base, return on investment, 16 revenues and operating costs at the same point in time. This ratemaking principle is 17 commonly referred to as the "matching" principle. It is a common practice in ratemaking in 18 Missouri to utilize a period beyond the established test year for a case in which to match the 19 major components of a utility's revenue requirement. Sometimes it is necessary to update test 20 year financial results to reflect information beyond the established test year in order to set 21 rates based upon the most current information that can be subjected to audit within the period 22 allowed to the Commission to deliberate on a utility's request to change its rate levels. In this

1 particular case, with the test year ordered at the twelve months ending June 30, 2013 and the 2 true-up ordered at December 31, 2013 an update period was not needed.

3

3) Selection of a "true-up date" or "true-up period." A true-up date 4 generally is established when a significant change in a utility's cost of service occurs after the 5 end of the test year period, but prior to the operation-of-law date, and one or more of the 6 parties has decided this significant change in cost of service should be considered for cost of 7 service recognition in the current case. True-up audits involve the filing of additional 8 testimony and, if necessary, additional hearings beyond the initial testimony filings and 9 hearings for a case.

10 4) Determination of Rate of Return. A cost of capital analysis must be 11 performed to determine a fair rate of return on investment to be allowed on Lake Region's net 12 investment (rate base) used in the provision of utility service. Staff witness Shana Atkinson 13 of the Financial Analysis Unit has performed a cost of capital analysis for this case.

14 5) Determination of Rate Base. Rate base represents the utility's net 15 investment used in providing utility service. For its direct filing, the Staff has determined 16 Lake Region's rate base as of June 30, 2013, consistent with the end of the test year period 17 established for this case.

18 Determination of Net Income Required. The net income required for 6) 19 Lake Region is calculated by multiplying the Staff's recommended rate of return by the rate base established as of June 30, 2013. The result represents net income required. Net income 20 21 required is then compared to net income available from existing rates to determine the 22 incremental change in the Company's rate revenues required to cover its operating costs and 23 provide a fair return on investment used in providing utility service.

1 7) Net Income from Existing Rates. Determining net income from 2 existing rates is the most time consuming process involved in determining the revenue requirement for a regulated utility. The starting point for determining net income from 3 4 existing rates is the unadjusted operating revenues, expenses, depreciation and taxes for the 5 test year which is the twelve month period ending June 30, 2013, for this case. All of the 6 utility's specific revenue and expense categories are examined to determine whether the 7 unadjusted test year results require annualization or normalization adjustments in order to 8 fairly represent the utility's most current level of operating revenues and expenses. Numerous changes occur over time that will impact a utility's annual level of operating 9 10 revenues and expenses.

11 8) The final step in determining whether a utility's rates are insufficient to 12 cover its operating costs and a fair return on investment is the comparison of net operating 13 income required (Rate Base x Recommended Rate of Return) to net income available from 14 existing rates (Operating Revenue less Operating Costs, Depreciation and Income Taxes). 15 The result of this comparison represents the recommended increase and/or decrease in the 16 utility's net income. This change in net income is then grossed up for income tax to 17 determine the recommended increase and/or decrease in the utility's operating revenues 18 through a rate change.

Q. Please identify the four types of adjustments which are made to unadjusted test
year results in order to reflect a utility's current annual level of operating revenues
and expenses.

A. The four types of adjustments made to reflect a utility's current annual
operating revenues and expenses are:

1 1) Normalization adjustments. Utility rates are intended to reflect normal 2 ongoing operations. A normalization adjustment is required when the test year reflects the 3 impact of an abnormal event. An example of an abnormal event is the impact that unusually 4 dry or rainy weather has on revenues for those customers whose water usage is weather 5 sensitive. Since utility rates are set using normalized processes, adjustments to test-year 6 levels must be made when it is determined that unusual or abnormal events cause usually high 7 or low results.

8 2) Annualization adjustments. Annualization adjustments are the most 9 common adjustment made to test year results to reflect the utility's most current annual level 10 of revenue and expenses. Annualization adjustments are required when changes have 11 occurred during the test year and/or update period which are not fully reflected in the 12 unadjusted test year results. For example, if a 3% pay increase occurred on January 1, 2013, 13 the June 30, 2013 test year will only reflect six months of the impact of the payroll increase. 14 An annualization adjustment is required to capture the financial impact of the payroll increase 15 for the other six months of the year. If the payroll increase were effective December 1, 2013, 16 then the test year ending June 30, 2013, would not reflect any of the annual cost of the 17 3% payroll increase.

Lake Region had a 2.9% payroll increase effective January 1, 2013, for its
employees. The Staff's payroll annualization, based upon employee levels and wage rates as
of June 30, 2013, restates the June 30, 2013 booked test year payroll expense to reflect
the annual financial impact of the January 1, 2013 payroll increases in the rate calculation for
the Company.

3) Disallowance adjustments. Disallowance adjustments are made to
 eliminate costs in the test year results that are not considered appropriate for recovery from
 ratepayers. One example of a disallowance is the removal from test year of charitable
 contributions. Charitable contributions are eliminated because they are not necessary to the
 provision of the utility service. Therefore, these costs should not be included in cost of
 service for recovery from ratepayers, and the Staff has proposed to disallow them from
 recovery in rates.

8 4) Proforma adjustments. Proforma adjustments are made because of the 9 need to reflect the impact of certain items and events that may occur subsequent to the test 10 year. Often, pro forma adjustments concern the financial impact of governmental mandates or 11 other events that are totally outside of the utility's control. This type of item or event may 12 significantly impact revenue, expense and the rate base relationship and should be recognized 13 to address the forward-looking objective of the test year. One example of a proforma 14 adjustment is a postal increase that is scheduled to occur after the test year. This would be a 15 known and measurable increase that would impact the company's billing expense every 16 month.

Q. What is Staff's recommended revenue requirement for Lake Region at the timeof this revenue requirement direct filing?

A. Staff's recommended revenue requirement for Lake Region's water and sewer
operations as follows:

1							
1	Lake Region Operating Entity	Annual Revenue	Rate Base at June 30, 2013				
		Requirement Staff ROE of					
		13.89%					
-	Horseshoe Bend Sewer	\$39,912	\$1,274,431				
-	Shawnee Bend Sewer	(\$195,641)	\$276,864				
-	Shawnee Bend Water	(\$103,683)	\$1,084,271				
2							
3	A true-up is planned to re	flect in Lake Regions' rates ad	ditional plant investment that				
4	is expected to be completed by	December 31, 2013, as well a	s offsetting plant retirements				
5	through that date. Other costs will also be examined in the true-up audit and are listed in						
6	Section III in Staff's report.						
7	Q. What are the major	r areas of this case?					
8	A. The following re	epresent a non-exhaustive li	st of areas that make up				
9	Staff's filing:						
10	• Rate of Ret	urn proposed by Staff					
11	• Plant and A	Accumulated Depreciation Rese	rve balances				
12	• Revenues						
13	• Availability	y Fees					
14	• Payroll						
15	Q. What amount of ra	ate increase did the Company r	equest from the Commission				
16	in this case?						
17	A. On July 17, 2013,	Lake Region filed tariffs desig	ned to implement an increase				
18	in its Shawnee Bend water rate	s, corresponding to a revenue	increase of \$74,197. This				
I							

represents an overall 34% increase to existing Lake Region Shawnee Bend water rates. The
Company also requested a revenue increase of \$1,673 (1%) and \$142,892 (31%) to its
Shawnee Bend and Horseshoe Bend sewer operations, respectively. The Company proposes a
rate of return on equity of 11.07% applied to a 40.10% equity capital structure to be used for
all three systems.

6 Q. What return on equity range is the Staff recommending for Lake Region7 in this case?

A. The Staff is recommending a return on equity of 13.89% as calculated by Staff
witness Atkinson. The Staff's recommended capital structure for Lake Region is based upon
a hypothetical capital structure of 25% common equity ratio and 5% embedded cost of debt
applied to a 75% long-term debt ratio. The resulting cost of capital to apply to rate base is
7.22%. The Staff's recommended weighted cost of capital is explained in more detail in
Section IV of Staff's Report.

14 Q. How did Staff calculate plant in service and accumulated depreciation reserve15 in this case?

A. Staff used its March 31, 2010 balances that were included in Staff's true-up
filing in the previous case, Cases Nos. SR-2010-0110 and WR-2010-0111, as the beginning
balances for these items. Then, Staff included any plant additions and retirements that have
occurred since the true-up date (March 31, 2010) in the previous case. Staff also made
corrections to the plant balances for errors in which plant was booked in the wrong accounts.

Q. What are the significant income statement adjustments the Staff made in
determining Lake Region's revenue requirement for this case?

23

A.

A summary of the Staff's significant income statement adjustments follows:

1	<b>Operating Revenues</b>
2 3	• Retail revenues were calculated based upon the number of customers as of June 30, 2013, and a three year average of usage by water customers.
4 5	• Staff is including revenue that is derived from "availability charges," or what is sometimes also called "availability fees."
6	<b>Depreciation and Amortization Expense</b>
7 8	• Depreciation expense is annualized based upon existing rates and the plant in service balances reflected in the Staff's rate base.
9	Payroll and Employee Benefit Costs
10 11	• Payroll expense is annualized based upon employee levels and wages as of June 30, 2013.
12	• Payroll taxes and payroll benefits are annualized as of June 30, 2013.
13	Other Non-Labor Expenses
14 15	• Lake Region's incurred rate case expense through the most current date is included in Staff's cost of service.
16 17 18	• Due to the Company's lack of equipment logs, Staff calculated equipment rental expense as if Lake Region owned equipment it is currently renting from a related party.
19	Q. What reliance did you place on the work or conclusions of other
20	Staff members?
21	A. An expert determining the revenue requirement for a regulated utility must rely
22	on the work from others responsible for developing specific inputs into the cost of service
23	calculation. I and the other assigned Staff auditors relied on the work from numerous other
24	Staff members in calculating a revenue requirement for Lake Region in this case.
25	Recommended depreciation rates and recommended rate of return are some examples of data
26	supplied to the Audit Unit as inputs into the Staff's cost of service calculation. The
27	qualifications for all Staff members not filing direct testimony who provided input to the

Staff's Cost of Service Report are attached as an appendix to the Report. Further, the name of
 each Staff member is identified at the conclusion of each section authored. These individuals
 may be providing rebuttal and/or surrebuttal testimony and schedules in subsequent phases of
 this case.

All of the work performed by Staff participants was done through the coordination and oversight of myself (Staff Utility Services Department Case Coordinator) and/or Mr. James M. Russo (Staff Utility Operations Department Case Coordinator). If the Commission has questions of a general or policy nature regarding the work performed by, or the positions taken by, Staff in this proceeding, both Mr. Russo and I will be available at hearing to answer questions of this nature. Staff will make available for cross examination all witnesses authoring a Report section.

12 Q. How does including availability fees in revenue impact the Staff's revenue13 requirement?

A. The inclusion of the availability fees in Staff's revenue requirement decreases
the revenue requirement for Shawnee Bend Water by \$136,836 and for Shawnee Bend Sewer
by \$205,254. This adjustment is the largest adjustment in Staff's cost of service for this case.

Q. Is it possible that significant differences exist between Staff's revenue
requirement position and those of other parties besides Lake Region in this proceeding?

A. Yes. However, the other parties are filing their direct testimony, if any,
concurrent with Staff's filing. Until Staff has a chance to examine the direct testimony of
other participants, it is impossible to determine what differences exist and how material they
may be.

1	Q.	When wil	l the	Staff	be	filing	its	customer	class	cost	of	service/rate	design
2	testimony and	report in th	nis pr	oceedi	ng?	)							

3

A. The Staff's direct customer class cost of service/rate design recommendations

4 will be filed on November 22, 2013.

- Q. Does this conclude your direct testimony in this proceeding?
- 6

5

A. Yes, it does.

#### **BEFORE THE PUBLIC SERVICE COMMISSION**

#### **OF THE STATE OF MISSOURI**

In the Matter of Lake Region Water & Sewer ) Company's Application to Implement a ) General Rate Increase in Water & Sewer ) Service )

Case No. WR-2013-0461

#### AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI	)	
	)	SS.
COUNTY OF COLE	)	

Kimberly K. Bolin, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Direct Testimony in question and answer form, consisting of 14 pages to be presented in the above case; that the answers in the foregoing Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.

Kimberly K. Bolin Kimberly R. Bolin

Subscribed and sworn to before me this 154 day of November, 2013.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2016 Commission Number: 12412070

Alisiellankin Notary Public

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
Empire District Electric	ER-2012-0345	<b><u>Direct</u></b> - Overview of Staff's Filing	Settled
Company		<b><u>Report on Cost of Service</u></b> – SWPA Hydro	
		Reimbursement, Joplin Tornado AAO	
		Asset, SPP Revenues, SPP Expenses,	
		Regulatory Plan Amortization Impacts,	
		SWPA Amortization, Tornado AAO	
		Amortization	
		<b>Rebuttal</b> – Unamortized Balance of Joplin	
		Tornado AAO, Rate Case Expense, True-	
		Up and Uncontested Issues	
		Surrebuttal – Unamortized Balance of	
		Joplin Tornado AAO, SPP Transmission	
		Expense, True-Up, Advanced Coal	
		Investment Tax Credit	
Missouri-American	WR-2011-0337	<b><u>Direct</u></b> – Overview of Staff's Filing	Settled
Water Company		Report on Cost of Service - True-Up	
		Recommendation, Tank Painting Tracker,	
		Tank Painting Expense	
		<b><u>Rebuttal</u></b> - Tank Painting Expense,	
		Business Transformation	
		Surrebuttal – Tank Painting Tracker,	
		Acquisition Adjustment	
Missouri-American	WR-2010-0131	<b><u>Report on Cost of Service</u></b> -	Settled
Water Company		Pension/OPEB Tracker, Tank Painting	
		Tracker, Deferred Income Taxes, FAS 87	
		Pension Costs, FAS 106 – Other Post-	
		Employment Benefits, Incentive	
		Compensation, Group Insurance and 401(k)	
		Employer Costs, Tank Painting Expense,	
		Dues and Donations, Advertising Expense,	
		Promotional Items, Current and Deferred	
		Income Tax Expense	
Empire District Gas	GR-2009-0434	<b><u>Report on Cost of Service</u></b> – Prepaid	Settled
Company		Pension Asset, Pension Tracker	
· ·		Asset/Liability, Unamortized Accounting	
		Authority Order Balances, Pension	
		Expense, OPEBs, Amortization of Stock	
		Issuance Costs, Amortization of Accounting	
		Authority Orders	
		<b><u>Direct</u></b> – Overview of Staff's Filing	

		SERLY K. BOLIN	
<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<b>Contested</b>
			<u>or Settled</u>
Laclede Gas Company	GT-2009-0056	<u>Surrebuttal Testimony –</u> Tariff	Contested
Missouri-American	WR-2008-0311	<b><u>Report on Cost of Service</u></b> – Tank Painting	Settled
Water Company Missouri Gas Utility,	& SR-2008-0312 GR-2008-0060	Tracker, Lobbying Costs, PSC Assessment <u>Direct</u> – Overview of Staff's Filing <u>Rebuttal</u> – True-Up Items, Unamortized Balance of Security AAO, Tank Painting Expense, Fire Hydrant Painting Expense <u>Surrebuttal</u> – Unamortized Balance of Security AAO, Cedar Hill Waste Water Plant, Tank Painting Expense, Fire Hydrant Painting Expense <u>Report on Cost of Service –</u> Plant-in	Settled
Inc.		Service/Capitalization Policy, Plant-in Service/Purchase Price Valuation, Depreciation Reserve, Revenues, Uncollectible Expense	
Laclede Gas Company	GR-2007-0208	<b>Direct</b> - Test Year and True-Up, Environmental costs, AAOs, Revenue, Miscellaneous Revenue, Gross receipts Tax, Gas Costs, Uncollectibles, EWCR, AMR, Acquisition Adjustment	Settled
Kansas City Power and Light Company	ER-2006-0314	Direct- Gross Receipts Tax, Revenues, Weather Normalization, Customer Growth/Loss Annualization, Large Customer Annualization, Other Revenue, Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Payroll Taxes, Employer 401 (k) Match, Other Employee Benefits Surrebuttal- Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Other Employee Benefits	Contested
Missouri Gas Energy	GR-2006-0204	<u><b>Direct</b></u> - Payroll, Incentive Compensation, Payroll Taxes, Employee Benefits, Lobbying, Customer & Governmental Relations Department, Collections Contract	Settled

Company Name	Case Number	<u>Testimony/Issues</u>	Contested or Settled
Missouri Gas Energy	GU-2005-0095	<b><u>Rebuttal</u></b> - Accounting Authority Order <u>Surrebuttal</u> - Accounting Authority Order	Contested
The Empire District Electric Company	ER-2004-0570	Direct- Payroll	Settled
Missouri American Water Company & Cedar Hill Utility Company	SM-2004-0275	Direct- Acquisition Premium	Settled
Missouri Gas Energy	GR-2004-0209	Direct-Safety Line Replacement Program; Environmental Response Fund; Dues & Donations; Payroll; Customer & Governmental Relations Department Disallowance; Outside Lobbyist Costs <b>Rebuttal</b> - Customer Service; Incentive Compensation; Environmental Response Fund; Lobbying/Legislative Costs <b>True-Up</b> - Rate Case Expense	Contested
Osage Water Company	ST-2003-0562 / WT-2003-0563	Direct- Payroll <u>Rebuttal</u> - Payroll; Lease Payments to Affiliated Company; alleged Legal Requirement of a Reserve	Case Dismissed
Missouri American Water Company	WR-2003-0500	<b>Direct</b> - Acquisition Adjustment; Water Treatment Plant Excess Capacity; Retired Treatment Plan; Affiliated Transactions; Security AAO; Advertising Expense; Customer Correspondence	Settled
Empire District Electric	ER-2002-424	Direct- Dues & Donations; Memberships; Payroll; Security Costs <u>Rebuttal</u> - Energy Traders' Commission <u>Surrebuttal</u> - Energy Traders' Commission	Settled

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Laclede Gas Company	GR-2002-356	DirectAdvertising Expense; SafetyReplacement Program and the CopperService Replacement Program; Dues &Donations Rate Case ExpenseRebuttalGas Safety ReplacementProgram / Deferred Income Taxes forAAOs	Settled
Missouri-American Water Company	WO-2002-273	<b><u>Rebuttal</u></b> - Accounting Authority Order <u><b>Cross-Surrebuttal</b></u> - Accounting Authority Order	Contested
Environmental Utilities	WA-2002-65	Direct- Water Supply Agreement <u>Rebuttal</u> - Certificate of Convenience & Necessity	Contested
Warren County Water & Sewer	WC-2002-160 / SC-2002-155	Direct- Clean Water Act Violations; DNR Violations; Customer Service; Water Storage Tank; Financial Ability; Management Issues <u>Surrebuttal</u> - Customer Complaints; Poor Management Decisions; Commingling of Regulated & Non-Related Business	Contested
Laclede Gas Company	GR-2001-629	<b><u>Direct</u></b> - Advertising Expense; Safety Replacement Program; Dues & Donations; Customer Correspondence	Settled
Gateway Pipeline Company	GM-2001-585	<b><u>Rebuttal</u></b> - Acquisition Adjustment; Affiliated Transactions; Company's Strategic Plan	Contested
Empire District Electric	ER-2001-299	Direct- Payroll; Merger Expense <u>Rebuttal</u> - Payroll <u>Surrebutta</u> l- Payroll	Settled
Osage Water Company	SR-2000-556/ WR-2000-557	Direct- Customer Service	Contested

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
St. Louis County Water Company	WR-2000-844	Direct - Main Incident Expense	Settled
Missouri American Water Company	WR-2000-281/ SR-2000-282	DirectWater Plant Premature Retirement;Rate Case ExpenseRebuttalWater Plant PrematureRetirementSurrebuttalWater Plant PrematureRetirement	Contested
Laclede Gas Company	GR-99-315	<b><u>Direct</u></b> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up	Contested
St. Joseph Light & Power	HR-99-245	Direct- Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up <u>Rebuttal</u> - Advertising Expense <u>Surrebuttal</u> - Advertising Expense	Settled
St. Joseph Light & Power	ER-99-247	<b>Direct</b> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <b>Rebuttal</b> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <b>Surrebuttal</b> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs	Settled
Laclede Gas Company	GR-98-374	<b><u>Direct</u></b> - Advertising Expense; Gas Safety Replacement AAO; Computer System Replacement Costs	Settled
Missouri Gas Energy	GR-98-140	<b><u>Direct</u></b> - Payroll; Advertising; Dues & Donations; Regulatory Commission Expense; Rate Case Expense	Contested

Company Name	Case Number	Testimony/Issues	Contested or Settled
Gascony Water Company, Inc.	WA-97-510	<b><u>Rebuttal</u></b> - Rate Base; Rate Case Expense; Cash Working Capital	Settled
Union Electric Company	GR-97-393	Direct - Interest Rates for Customer Deposits	Settled
St. Louis County Water Company	WR-97-382	<b><u>Direct</u></b> - Interest Rates for Customer Deposits, Main Incident Expense	Settled
Associated Natural Gas Company	GR-97-272	Direct-Acquisition Adjustment; InterestRates for Customer DepositsRebuttal-Acquisition Adjustment; InterestRates for Customer DepositsSurrebuttal-Interest Rates for CustomerDeposits	Contested
Missouri-American Water Company	WA-97-45	<b><u>Rebuttal</u></b> - Waiver of Service Connection Charges	Contested
Imperial Utility Corporation	SC-96-427	Direct- Revenues, CIAC Surrebuttal- Payroll; Uncollectible Accounts Expense; Rate Case Expense, Revenues	Settled
St. Louis Water Company	WR-96-263	Direct-Main Incident Repairs <u>Rebuttal</u> - Main Incident Repairs <u>Surrebutta</u> l- Main Incident Repairs	Contested
Steelville Telephone Company	TR-96-123	<b><u>Direct</u></b> - Depreciation Reserve Deficiency	Settled

Company Name	<u>Case Number</u>	Testimony/Issues	Contested or Settled
Missouri-American Water Company	WR-95-205/ SR-95-206	<b>Direct</b> - Property Held for Future Use; Premature Retirement of Sewer Plant; Depreciation Study Expense; Deferred Maintenance <b>Rebuttal</b> - Property Held for Future Use; Premature Retirement of Sewer Plant; Deferred Maintenance <u>Surrebutta</u> l- Property Held for Future Use; Premature Retirement of Sewer Plant	Contested
St. Louis County Water Company	WR-95-145	<u>Rebuttal</u> - Tank Painting Reserve Account; Main Repair Reserve Account <u>Surrebuttal</u> - Main Repair Reserve Account	Contested