Exhibit No.:

Issues: Inclusion of Plastic Main and

Service Line Replacements

Witness: Kimberly K. Bolin ng Party: MoPSC Staff

Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GO-2016-0332 and

GO-2016-0333

Date Testimony Prepared: December 23, 2016

MISSOURI PUBLIC SERVICE COMMISSION COMMISSION STAFF DIVISION AUDITING

REBUTTAL TESTIMONY

OF

KIMBERLY K. BOLIN

MISSOURI GAS ENERGY CASE NO. GO-2016-0332

And

LACLEDE GAS COMPANY CASE NO. GO-2016-0333

Jefferson City, Missouri December 2016

1		REBUTTAL TESTIMONY
2		\mathbf{OF}
3		KIMBERLY K. BOLIN
4 5		MISSOURI GAS ENERGY CASE NO. GO-2016-0332
6 7		And
8 9 10		LACLEDE GAS COMPANY CASE NO. GO-2016-0333
11	Q.	Please state your name and business address.
12	A.	Kimberly K. Bolin, P.O. Box 360, Suite 440, Jefferson City, MO 65102.
13	Q.	By whom are you employed and in what capacity?
14	A.	I am a Utility Regulatory Auditor for the Missouri Public Service Commission
15	("Commissi	on").
16	Q.	Please describe your educational background and work experience.
17	A.	I graduated from Central Missouri State University in Warrensburg, Missouri
18	with a Bach	nelor of Science in Business Administration, major emphasis in Accounting, in
19	May 1993.	Before coming to work at the Commission, I was employed by the Missouri
20	Office of the	e Public Counsel ("OPC") as a Public Utility Accountant from September 1994 to
21	April 2005.	I commenced employment with the Commission in April 2005.
22	Q.	What was the nature of your job duties when you were employed by OPC?
23	A.	I was responsible for performing audits and examinations of the books and
24	records of p	ublic utilities operating within the state of Missouri.

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with OPC and with the Commission.

areas of which you are testifying as an expert witness?

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Q. Have you previously filed testimony before this Commission?

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Q. What knowledge, skill, experience, training and education do you have in the

Rebuttal Testimony, for a list of the major audits in which I have assisted and filed testimony

Yes, numerous times. Please refer to Schedule KKB-r1, attached to this

- 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 20 years and have submitted testimony on ratemaking matters numerous times before the Commission. I have also been responsible for the supervision of other
- Q. Have you participated in the Commission Staff's ("Staff") review of the applications filed by Laclede Gas Company ("Laclede") in Case No. GO-2016-0333 and Missouri Gas Energy ("MGE") (together, "Companies") in Case No. GO-2016-0332?
 - A. Yes, I have, with the assistance of other members of Staff.

Commission employees in rate cases and other regulatory proceedings.

EXECUTIVE SUMMARY

- Q. Please summarize your testimony in this proceeding.
- A. In this testimony, I will discuss the objection raised by OPC witness Charles R. Hyneman in his direct testimony in this proceeding to Laclede's and MGE's request to include certain costs associated with replacement of plastic main and service lines in their proposed Infrastructure System Replacement Surcharge ("ISRS") mechanism rate adjustments. The Staff's position is that the costs associated with replacement of the plastic

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main and service lines incurred by Laclede and MGE within this ISRS period are appropriately included for recovery in ISRS rates.

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REPLACEMENT OF PLASTIC MAINS AND SERVICE LINES

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- Q. Please describe the circumstances under which the plastic main that is being currently replaced by Laclede and MGE was originally installed.
- A. Based upon prior discussions with Laclede and MGE, as well as responses by the Companies to data requests in this proceeding, Staff's understanding is that almost all, if not all, of the sections of plastic main that are currently being replaced were installed in the past to immediately repair a leak on a section of line that consisted mostly of bare steel or cast iron. At a later point when Laclede/MGE deemed that this section of that gas main needed to be replaced in its entirety, Laclede/MGE typically abandoned the gas main in place and constructed a new main and, where appropriate, also replaced connected service lines to customer's residences.
- Q. On page 8 of OPC witness Hyneman's direct testimony, he cites a response provided by Laclede to OPC Data Request Number 7. Does Mr. Hyneman cite the whole response in his testimony?
 - A. No. The whole response to Data Request No. 7 is as follows:

The plastic portion of the main was no longer usable because the cast iron and bare steel main that it was connected to was being replaced. The plastic portions were usually put into service when main replacements were being done on a piecemeal basis as leaks were discovered. Please note that the pipeline replacements under the current programs are not generally done through insertion or Rather, the replacement pipe is placed in its entirety excavation. separate from the original main. The original pipe is usually maintained in service so customers do not lose their service while the project is completed and then it is abandoned in place. The entire line was both part of a main replacement project and was worn out or in

deteriorated condition. While certain parts of any line may not be in such condition, it is not economically or practically feasible to separate those parts from the entire length of the line. The strategic approach to replacements have [sic] led to efficiency savings by reducing the feet of line installed. (In fact, in this case, the removal of cast iron by itself exceeded the amount of plastic main installed.) [**Emphasis added**]

- Q. Why is OPC taking the position that costs associated with replacing plastic mains or service lines should not be allowed recovery in ISRS?
- A. OPC is claiming that only costs of replacing pipe that is "worn out" or in a "deteriorated condition" should be allowed for recovery in ISRS, and that relatively new plastic pipe installed as a "patch" on older lines cannot be considered as either worn out or deteriorated.
- Q. In Mr. Hyneman's testimony on page 7, he provides a table that lists the total feet of replaced plastic mains and service lines taken from certain replacement work orders that he claims is not worn out or deteriorated. In this discussion, is Mr. Hyneman making a general assumption that plant should not be assumed to be worn out or deteriorated if the main or service line in question has not reached the end of its depreciable service life?
- A. Yes, it appears that this is the criterion Mr. Hyneman is using to determine if a plastic main or service line should be considered to be worn out or deteriorated. Mr. Hyneman offers no other criteria for this judgment.
 - Q. Can plant wear out before the end of its estimated depreciable life?
- A. Yes. Depreciable lives are estimates based upon a Company's history of plant longevity. Any piece of plant can be usable for a period longer or shorter than the estimated depreciable life assigned to the plant in a rate case.
- Q. Has Laclede replaced plastic service lines that were older than the depreciable life assigned to plastic service lines?

- A. Yes, my review of these work orders indicated that Laclede has removed plastic service lines that were older than the depreciable life assigned to plastic service lines. The Laclede work orders listed in OPC's direct testimony also indicated that cast iron mains dating back to 1905 were replaced.
- Q. Is OPC recommending that Laclede or MGE change how it undertakes plant replacement projects?
- A. No, per page 9, lines 8 13 of Mr. Hyneman's direct testimony. OPC is only taking the position that Laclede or MGE not include any costs associated with replacing plastic pipe in ISRS requests.
- Q. If OPC's position on this issue is adopted of not allowing any recovery of costs to replace plastic pipe embedded within older materials, would this provide Laclede or MGE an incentive to replace pipe that may need to be replaced but contains sections of plastic pipe?
- A. No. In fact, OPC's proposal would appear to encourage a company to avoid replacing any section of pipe that contains plastic pipe.
- Q. Is OPC's interpretation of the ISRS statute and rule language consistent with appropriate practices in regard to main and service line replacement?
- A. No, in Staff's view. The logical result of OPC's interpretation of the ISRS statute and rule language is that a section of pipe should only be replaced if every foot of the entire pipe is found to be worn out or deteriorated. As Laclede had stated in response to OPC Data Request No. 7 that was quoted earlier in this testimony, the reason plastic pipe was replaced was because the majority of the section of pipe was worn out or deteriorated. The plastic pipe that was being replaced as a result of these decisions was only present due to earlier actions to fix leaks in sections of pipe on a piecemeal basis as they were discovered.

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21 22 Hazardous leaks need to be repaired immediately for safety purposes. In other words these sections of plastic pipe were installed to take care of an immediate problem until Laclede could schedule and budget for a larger main replacement. Main replacement is a costly and lengthy process which takes a considerable amount of planning and budgeting.

- Q. Does Staff support Laclede's current approach of replacing main and service lines?
- A. Yes. Staff supports Laclede's approach of making decisions regarding replacement of mains and service lines based upon the condition of the pipe as a whole, including pipe that may include plastic sections. In this manner, pipe constructed largely of cast iron and bare steel that present safety concerns can be replaced in a timely manner, with the full cost of such replacements appropriately recovered in ISRS charges.
- Q. On page 11 of OPC witness Hyneman's Direct Testimony, he claims, "There are very simple methods that could be used to separate the eligible ISRS costs from the ineligible ISRS costs." Does Mr. Hyneman provide a list or an example of the simple methods for valuing the ISRS adjustments he refers to?
- A. No. In fact, Mr. Hyneman seems to want Laclede and MGE to have to provide definitive proof that the plastic pipe retired was worn or in deteriorated condition before OPC would recommend any recovery of that amount through ISRS. However, this would not be a simple request since most of the pipe retired by Laclede and MGE is abandoned in place; i.e, not physically removed. To physically remove and inspect the plastic portion of the main or service line in order to verify their condition would be more costly and time consuming than the approach that Laclede and MGE are currently using for most line replacements.

Q. Does Mr. Hyneman's chart on page 7 of his direct testimony that presents information from a sample of Laclede work orders break down how much main versus service lines by material type were replaced by Laclede?

A. No, but the following chart shows how many feet of steel and cast iron main, plastic main, steel service line, copper service line and plastic service line were replaced within the same sample work orders:

Work Order	Feet of Mains Replaced			Feet of	Feet of Service Lines Replaced		
Number	Steel and Cast Iron	Plastic	Total	Steel	Copper	Plastic	Total
9000836	4,259	1,409	5,668	3,214	477	3,909	7,600
900546	7,252	526	7,778	309	2,055	4,022	6,386
900547	6,946	2,075	9,021	738	1,866	6,654	9,258
900983	4,269	0	4,269	1,207	1,100	3,568	5,875
900882	3,301	1,642	4,943	586	565	6,661	7,812
900609	2,617	1,357	3,974	356	2,481	1,842	4,679
900747	9,819	123	9,942	687	617	2,585	3,889
901163	2,077	443	2,520	151	253	1,106	1,510
901090	4,128	1,162	5,290	1,608	786	3,876	6,270
Total	44,668	8,737	53,405	8,856	10,200	34,223	53,279

Q. What percentage of mains replaced by Laclede were plastic mains?

A. Within the work orders cited by OPC, approximately 16 % of the mains replaced were plastic, with 84% consisting of either steel, cast iron or copper. However,

Laclede replaced a larger percentage of plastic service lines. 64 % of the service lines

replaced by Laclede were plastic service lines.

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Q. Has Laclede provided justification for replacement of the plastic service lines?

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A. Yes. Laclede responded in the following manner to OPC Data Request No. 6: Generally Laclede will only replace the service line when there is an operational/safety reason for doing so, such as a line failure or the need to relocate the line to accommodate moving the meter from the inside to the outside of the customer's premises due to the safety concerns of running intermediate pressure gas into an enclosed basement.

On page 8 of Mr. Hyneman's direct testimony, does he also list several MGE Q. work orders?

A. Yes, he lists 14 MGE work orders that he reviewed in which some amount of plastic main was replaced. However, his analysis does not include the amount of steel/cast iron main or service lines were replaced. The following analysis shows the breakdown between steel/cast iron and plastic main replacement within the MGE work orders cited by Mr. Hyneman:

		Feet of Main Replace	ed	Feet Replaced
Work Order	Steel and Cast	Plastic	Total	Service Lines
Number	Iron			
009224	2,123	1,923	4,046	
005456	13,111	962	14,073	
009225	8,535	908	9,443	
009230	5,805	1,176	6,981	
800072	11,143	845	11,988	
800045	4,273	36	4,633	
800254	7,990	391	8,381	
800178	4,232	650	4,882	
800086	465	321	786	1 foot steel
800085	4,538	472	5,010	
800084	5,900	1,680	7,580	
800083	11,697	2,301	13,998	90 feet plastic
800543	4,017	398	4,415	
800145	5,176	494	5,670	
Total	89,005	12,881	101,886	

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- Q. What percentage of main replaced by MGE was plastic main?
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- A. Approximately 13% of the main placed by MGE was plastic main, with the remainder being cast iron or bare steel. One obvious operational difference between MGE
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- and Laclede is that fewer plastic service lines were shown as being replaced by MGE.
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- Q. Why did MGE replace fewer service lines than Laclede?
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- A. My understanding is that MGE already replaced most of its service lines in the 1990s as part of its service line replacement program.
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- Q. Does this conclude your rebuttal testimony in this proceeding?
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- A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

)	20
)	Case No GO-2016-0332
)	
)	and
)))	Case No. GO-2016-0333
)))))))

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)	
)	SS
COUNTY OF COLE)	

COMES NOW KIMBERLY K. BOLIN 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.

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 A3 A day of December, 2016.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377

Notary Public

Company Name	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested or Settled
Empire District Electric Company/Liberty Utilities	EM-2016-0213	Rebuttal – Overview of Transaction, Ratemaking /Accounting Conditions, Access to Records Surrebuttal – OPC Recommended Conditions, SERP	Settled
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	<u>Direct</u> – Partial Disposition Agreement	Contested
Empire District Electric Company	ER-2016-0023	Requirement Report – Riverton Conversion Project and Asbury Air Quality Control System Direct – Overview of Staff's Revenue Requirement Report and Overview of Staff's Rate Design Filing	Settled
Missouri-American Water Company	WR-2015-0301	Report on Cost of Service – Corporate Allocation, District Allocations Rebuttal – District Allocations, Business Transformation Surrebuttal – District Allocations, Business Transformation, Service Company Costs	Settled
Empire District Electric Company	ER-2014-0351	Direct – Overview of Staff's Filing Rebuttal - ITC Over-Collection, Cost of Removal Deferred Tax Amortization, State Flow-Through Surrebuttal – Unamortized Balance of Joplin Tornado, ITC Over-Collections, Cost of Removal Deferred Tax Amortization, State Flow-Through, Transmission Revenues and Expenses	Settled
Brandco Investments/ Hillcrest Utility Operating Company, Inc.	WO-2014-0340	Rebuttal – Rate Base and Future Rates	Settled

CASE PARTICIPATION OF

KIMBERLY K. BOLIN

Company Name	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested
			or Settled
Lake Region Water &	WR-2013-0461	<u>Direct</u> – Overview of Staff's Filing	Contested
Sewer		Report on Cost of Service – True-Up,	
		Availability Fees, Sewer Operating	
		Expense, Sewer Equipment Maintenance	
		Expense	
		Surrebuttal – Availability Fees	
		<u>True-Up Direct</u> – Overview of True-Up	
		Audit	
		<u>True-Up Rebuttal</u> – Corrections to True-	
		Up	
Empire District Electric	ER-2012-0345	<u>Direct</u> - Overview of Staff's Filing	Settled
Company		Report on Cost of Service – SWPA Hydro	
		Reimbursement, Joplin Tornado AAO	
		Asset, SPP Revenues, SPP Expenses,	
		Regulatory Plan Amortization Impacts,	
		SWPA Amortization, Tornado AAO	
		Amortization	
		Rebuttal – 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	<u>Direct</u> – Overview of Staff's Filing	Settled
Water Company		Report on Cost of Service - True-Up	
		Recommendation, Tank Painting Tracker,	
		Tank Painting Expense	
		Rebuttal - Tank Painting Expense,	
		Business Transformation	
		Surrebuttal – Tank Painting Tracker,	
	****	Acquisition Adjustment	~
Missouri-American	WR-2010-0131	Report on Cost of Service -	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	

CASE PARTICIPATION OF

KIMBERLY K. BOLIN

Company Name	Case Number	Testimony/Issues	Contested
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Empire District Gas Company	GR-2009-0434	Report on Cost of Service – Prepaid Pension Asset, Pension Tracker Asset/Liability, Unamortized Accounting Authority Order Balances, Pension Expense, OPEBs, Amortization of Stock Issuance Costs, Amortization of Accounting Authority Orders Direct – Overview of Staff's Filing	Settled
Laclede Gas Company	GT-2009-0056	<u>Surrebuttal Testimony – Tariff</u>	Contested
Missouri-American Water Company	WR-2008-0311 & SR-2008-0312	Report on Cost of Service – Tank Painting Tracker, Lobbying Costs, PSC Assessment Direct – Overview of Staff's Filing Rebuttal – True-Up Items, Unamortized Balance of Security AAO, Tank Painting Expense, Fire Hydrant Painting Expense Surrebuttal – Unamortized Balance of Security AAO, Cedar Hill Waste Water Plant, Tank Painting Expense, Fire Hydrant Painting Expense	Settled
Missouri Gas Utility, Inc.	GR-2008-0060	Report on Cost of Service – Plant-in Service/Capitalization Policy, Plant-in Service/Purchase Price Valuation, Depreciation Reserve, Revenues, Uncollectible Expense	Settled
Laclede Gas Company	GR-2007-0208	<u>Direct</u> - Test Year and True-Up, Environmental costs, AAOs, Revenue, Miscellaneous Revenue, Gross receipts Tax, Gas Costs, Uncollectibles, EWCR, AMR, Acquisition Adjustment	Settled

CASE PARTICIPATION OF

KIMBERLY K. BOLIN

Company Name	Case Number	<u>Testimony/Issues</u>	Contested or 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	Direct- Payroll, Incentive Compensation, Payroll Taxes, Employee Benefits, Lobbying, Customer & Governmental Relations Department, Collections Contract	Settled

Company Name	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested or Settled
Missouri Gas Energy	GU-2005-0095	Rebuttal - Accounting Authority Order Surrebuttal - Accounting Authority Order	Contested
The Empire District Electric Company	ER-2004-0570	<u>Direct</u> - Payroll	Settled
Missouri American Water Company & Cedar Hill Utility Company	SM-2004-0275	<u>Direct</u> - Acquisition Premium	Settled
Missouri Gas Energy	GR-2004-0209	<u>Direct</u> - Safety Line Replacement Program; Environmental Response Fund; Dues & Donations; Payroll; Customer & Governmental Relations Department Disallowance; Outside Lobbyist Costs <u>Rebuttal</u> - Customer Service; Incentive Compensation; Environmental Response Fund; Lobbying/Legislative Costs <u>True-Up</u> - Rate Case Expense	Contested
Osage Water Company	ST-2003-0562 / WT-2003-0563	<u>Direct</u> - 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	<u>Direct</u> - 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	<u>Direct</u> - Dues & Donations; Memberships; Payroll; Security Costs <u>Rebuttal</u> - Energy Traders' Commission <u>Surrebuttal</u> - Energy Traders' Commission	Settled

Company Name	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested or Settled
Laclede Gas Company	GR-2002-356	<u>Direct</u> - Advertising Expense; Safety Replacement Program and the Copper Service Replacement Program; Dues & Donations; Rate Case Expense <u>Rebuttal</u> - Gas Safety Replacement Program / Deferred Income Taxes for AAOs	Settled
Missouri-American Water Company	WO-2002-273	Rebuttal - Accounting Authority Order Cross-Surrebuttal - Accounting Authority Order	Contested
Environmental Utilities	WA-2002-65	<u>Direct</u> - Water Supply Agreement <u>Rebuttal</u> - Certificate of Convenience & Necessity	Contested
Warren County Water & Sewer	WC-2002-160 / SC-2002-155	<u>Direct</u> - 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	<u>Direct</u> - Advertising Expense; Safety Replacement Program; Dues & Donations; Customer Correspondence	Settled
Gateway Pipeline Company	GM-2001-585	Rebuttal- Acquisition Adjustment; Affiliated Transactions; Company's Strategic Plan	Contested
Empire District Electric	ER-2001-299	<u>Direct</u> - Payroll; Merger Expense <u>Rebuttal</u> - Payroll <u>Surrebuttal</u> - Payroll	Settled
Osage Water Company	SR-2000-556/ WR-2000-557	<u>Direct</u> - Customer Service	Contested

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

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

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