MISSOURI PUBLIC SERVICE COMMISSION

STAFF REBUTTAL REPORT

APPENDIX 1

Staff Credentials

AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2021-0087

Jefferson City, Missouri August 2021

AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2021-0087

APPENDIX 1

STAFF CREDENTIALS

TABLE OF CONTENTS

Kimberly K. Bolin	1
Claire M. Eubanks, PE	12
Sarah L.K. Lange	
Shawn E. Lange	22
Seoung Joun Won, PhD	25

Kimberly K. Bolin

Credentials and Case Participation

PRESENT POSITION:

I am a Utility Regulatory Manager for the Missouri Public Service Commission. As a Utility Regulatory Manager in this proceeding, I am responsible for the supervision of other Commission employees.

EDUCATIONAL CREDENTIALS AND WORK EXPERIENCE:

I graduated from Central Missouri State University in Warrensburg, Missouri, with a Bachelor of Science in Business Administration, major emphasis in Accounting, in May 1993. Prior to working at the Commission, I was employed by the Missouri Office of the Public Counsel (OPC) as a Public Utility Accountant from September 1994 to April 2005. OPC represents residential and small commercial customers before the Commission. I have been employed by this Commission or by OPC as a Regulatory Auditor for over 25 years, and have submitted testimony on ratemaking matters numerous times before the Commission.

CASE PARTICIPATION

Company Name	Case Number	<u>Testimony/Issues</u>	Contested
			or Settled
Missouri-American	WR-2020-0344	<u>Cost of Service Report</u> – Future Test Year,	Settled
Water Company		Credit Card Fee Expense, Amortization of	
		Excess ADIT, COVID-19 AAO Recovery	
		Rebuttal – Future Test Year, COVID-19	
		AAO Recovery, Amortization of Excess	
		ADIT, Affiliate Transactions, AFUDC Rate	
		Surrebuttal – Future Test Year, COVID-19	
		AAO, Tax Cut and Jobs Act of 2017,	
		Outside Services, COVID Impacts on	
		Revenue	

Company Name	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested or Settled
Spire Missouri, Inc.	GU-2020-0376	Rebuttal – Accounting Authority Order, Lost Revenues	Settled
Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	EU-2020-0350	Rebuttal – Accounting Authority Order, Lost Revenue, Carrying Costs	Contested
Empire District Electric Company	ER-2020-0311	Rebuttal – Coal Inventory Adjustment Surrebuttal – Coal Inventory Adjustment	Settled
Empire District Electric Company	ER-2019-0374	Direct – Overview of Staff's Filing Cost of Service Report – Executive Overview, Test year/True-Up Period, Vegetation Management Tracker Regulatory Asset, Iatan and Plum Point Carrying Costs, Stub Period Tax Cut/Removal of Tax Impact, Tornado AAO, Rate Case Expense Sharing, Credit Card Fees, Clearing Accounts Rebuttal – Asset Retirement Obligations, AAO and Tracker Policy, Affiliate Transactions Surrebuttal/True-Up – Unamortized Balance of Joplin AAO, Credit Card Fees, Payroll Test year, Rate Case Expense Sharing, LED Lighting, Low-Income Pilot Program Amortization, Affiliate Transactions Supplemental – Jurisdictional Allocations, Rate Case Expense, Management Expense, Pension and OPEBs, Affiliate Transactions, Software Maintenance	Contested
Confluence Rivers Utility Operating Co., Inc.	WA-2019-0299	Surrebuttal – Quality of Service Direct – Net Book Value of Plant	Contested
Osage Utility Operating Co., Inc.	WA-2019-0185	Surrebuttal – Rate Base, Acquisition Incentive	Contested
Spire Inc.	GO-2019-0115 and GO-2019- 116	Staff Direct Report – Blanket Work Orders and Current Income Taxes	Contested
Empire District Electric Company and Liberty Utilities	AO-2018-0179	<u>Direct</u> – Moneypool <u>Surrebuttal</u> - Moneypool	Contested

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
Confluence Rivers Utility Operating Company, Inc.	WM-2018-0116 and SM-2018- 0117	<u>Direct</u> – Rate Base, Roy L Utilities	Settled
Spire Missouri Inc.	GO-2016-0332, GO-2016-0333, GO-2017-0201, GO-2017-0202 GO-2018-0309 and GO-2018- 0310	<u>Direct</u> – Removal of Plastic Main and Service Line Replacement Costs	Contested
Missouri-American Water Company	WR-2017-0285	Cost of Service Report – Pension/OPEB Tracker, FAS 87 Pension Costs, FAS 106 OPEBs Costs, Franchise Taxes Rebuttal – Defined Contribution Plan, Cloud Computing, Affiliate Transaction Rule (Water Utility) Surrebuttal – Rate Case Expense	Settled
Missouri-American Water Company	WO-2018-0059	<u>Direct</u> – ISRS Overview, Accumulated Deferred Income Taxes, Reconciliation	
Missouri Gas Energy and Laclede Gas Company	GO-2016-0332 and GO-2016- 0333	Rebuttal – Inclusion of Plastic Main and Service Line Replacements	Contested
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

Company Name	Case Number	<u>Testimony/Issues</u>	Contested
	77 4011 0071	7	or Settled
Empire District Electric Company	ER-2014-0351	<u>Direct</u> – Overview of Staff's Filing <u>Rebuttal</u> - ITC Over-Collection, Cost of	Settled
		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	
Brandco Investments/ Hillcrest Utility Operating Company, Inc.	WO-2014-0340	Rebuttal – Rate Base and Future Rates	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	
		True-Up Direct – Overview of True-Up Audit	
		<u>True-Up Rebuttal</u> – Corrections to True-	
	77 4014 0015	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 Pobuttal Unamortized Palance of Ionlin	
		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	

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
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	
Empire District Gas	GR-2009-0434	Report on Cost of Service – Prepaid	Settled
Company	OR 2007 0131	Pension Asset, Pension Tracker	Settled
Company		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	
		Direct Overview of Staff 3 I ming	
Laclede Gas Company	GT-2009-0056	Surrebuttal Testimony – Tariff	Contested
l ,			
Missouri-American	WR-2008-0311	Report on Cost of Service – Tank Painting	Settled
Water Company	&	Tracker, Lobbying Costs, PSC Assessment	
	SR-2008-0312	<u>Direct</u> – 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	
	1		

Company Name	Case Number	<u>Testimony/Issues</u>	Contested or 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
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>Direct</u> - 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	Case Number	<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	Direct- Clean Water Act Violations; DNR Violations; Customer Service; Water Storage Tank; Financial Ability; Management Issues Surrebuttal- 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	Direct- Water Plant Premature Retirement; Rate Case Expense Rebuttal- Water Plant Premature Retirement Surrebuttal- 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 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	Testimony/Issues	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	Direct - 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	<u>Direct</u> -Main Incident Repairs <u>Rebuttal</u> - Main Incident Repairs <u>Surrebuttal</u> - 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

CLAIRE M. EUBANKS, PE

PRESENT POSITION:

I am the Manager of the Engineering Analysis Department, Industry Analysis Division of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND AND WORK EXPERIENCE:

I received my Bachelor of Science degree in Environmental Engineering from the University of Missouri – Rolla, now Missouri University of Science and Technology, in May 2006. I am a licensed professional engineer in the states of Missouri and Arkansas. Immediately after graduating from UMR, I began my career with Aquaterra Environmental Solutions, Inc., now SCS Aquaterra, an engineering consulting firm based in Overland Park, Kansas. During my time with Aquaterra, I worked on various engineering projects related to the design, construction oversight, and environmental compliance of solid waste landfills. I began my employment with the Commission in November 2012 and was promoted to my current position in April 2020.

CASE HISTORY:

Case Number	Utility	Туре	Issue
EA-2012-0281	Ameren	Rebuttal	Certificate of Convenience and Necessity
EC-2013-0379 EC-2013-0380	KCP&L KCP&L GMO	Rebuttal	RES Compliance
EO-2013-0458	Empire	Memorandum	RES Compliance Plan & Report
EO-2013-0462	Ameren	Memorandum	RES Compliance Report
EO-2013-0503	Ameren	Memorandum	RES Compliance Plan
EO-2013-0504	KCPL	Memorandum	RES Compliance Plan & Report
EO-2013-0505	GMO	Memorandum	RES Compliance Plan & Report
ET-2014-0059	KCP&L GMO	Rebuttal	RES Retail Rate Impact
ET-2014-0071	KCP&L	Rebuttal	RES Retail Rate Impact
ET-2014-0085	Ameren	Rebuttal	RES Retail Rate Impact
ER-2014-0258	Ameren	Cost of Service Report, Surrebuttal	RES, In-Service

cont'd Claire M. Eubanks, PE

Case Number	Utility	Туре	Issue
EO-2014-0151	KCP&L GMO	Memorandum	RESRAM
EO-2014-0357	Electric	Memorandum	Solar Rebates Payments
EO-2014-0287	KCPL	Memorandum	RES Compliance Plan
EO-2014-0288	GMO	Memorandum	RES Compliance Plan
EO-2014-0289	KCPL	Memorandum	RES Compliance Report
EO-2014-0290	GMO	Memorandum	RES Compliance Plan
ER-2014-0370	KCP&L	Cost of Service Report	RES
EX-2014-0352	N/A	Live Comments	RES rulemaking
EC-2015-0155	GMO	Memorandum	Solar Rebate Complaint
EO-2015-0260	Empire	Memorandum	RES Compliance Plan & Report
EO-2015-0263	KCPL	Memorandum	RES Compliance Report
EO-2015-0264	GMO	Memorandum	RES Compliance Report
EO-2015-0265	KCPL	Memorandum	RES Compliance Plan
EO-2015-0266	GMO	Memorandum	RES Compliance Plan
EO-2015-0267	Ameren	Memorandum	RES Compliance Plan & Report
EO-2015-0252	GMO	Staff Report	Integrated Resource Plan – Renewable Energy Standard
EO-2015-0254	KCPL	Staff Report	Integrated Resource Plan – Renewable Energy Standard
EA-2015-0256	KCP&L GMO	Live Testimony	Greenwood Solar CCN
EO-2015-0279	Empire	Memorandum	RES Compliance Plan & Report
ET-2016-0185	KCP&L	Memorandum	Solar Rebate Tariff Suspension
EO-2016-0280	KCPL	Memorandum	RES Compliance Report
EO-2016-0281	GMO	Memorandum	RES Compliance Report
EO-2016-0282	KCPL	Memorandum	RES Compliance Plan
EO-2016-0283	GMO	Memorandum	RES Compliance Plan
EO-2016-0284	Ameren	Memorandum	RES Compliance Plan & Report
ER-2016-0023	Empire	Report	RES
ER-2016-0156	KCP&L GMO	Rebuttal	RESRAM Prudence Review

cont'd Claire M. Eubanks, PE

Case Number	Utility	Туре	Issue
EA-2016-0208	Ameren	Rebuttal	Certificate of Convenience and Necessity
ER-2016-0285	KCPL	Cost of Service Report	In-Service, Greenwood Solar
ER-2016-0179	Ameren	Rebuttal	In-Service, Labadie Landfill
EW-2017-0245	Electric	Report	Working Case on Emerging Issues in Utility Regulation
EO-2017-0268	Ameren	Memorandum	RES Compliance Plan & Report
EO-2017-0269	KCPL	Memorandum	RES Compliance Report
EO-2017-0271	KCPL	Memorandum	RES Compliance Plan
GR-2017-0215 & GR-2017-0216	Spire	Rebuttal & Surrebuttal	CHP for Critical Infrastructure
GR-2018-0013	Liberty Utilities (Midstates Natural Gas)	Rebuttal	CHP Outreach Initiative for Critical Infrastructure Resiliency
EO-2018-0287	Ameren	Memorandum	RES Compliance Plan & Report
EO-2018-0288	KCPL	Memorandum	RES Compliance Report
EO-2018-0290	KCPL	Memorandum	RES Compliance Plan
EA-2016-0207	Ameren	Memorandum	Certificate of Convenience and Necessity
ER-2018-0146	GMO	Cost of Service Report	RESRAM Prudence Review
ER-2018-0145 ER-2018-0146	KCPL GMO	Class Cost of Service Report, Rebuttal	Solar Subscription Pilot Rider, Standby Service Rider
EA-2018-0202	Ameren	Staff Report	Certificate of Convenience and Necessity
EE-2019-0076	Ameren	Memorandum	Variance Request – Reliability Reporting
EA-2019-0021	Ameren	Staff Report	Certificate of Convenience and Necessity
EA-2019-0010	Empire	Staff Report	Certificate of Convenience and Necessity
EX-2019-0050	N/A	Live Comments	Renewable Energy Standard

cont'd Claire M. Eubanks, PE

Case Number	Utility	Туре	Issue
EO-2019-0315	KCPL	Memorandum in Response to Commission Questions	Renewable Energy Standard
EO-2019-0316	GMO	Memorandum	Renewable Energy Standard
EO-2019-0317	KCPL	Memorandum in Response to Commission Questions	Renewable Energy Standard
EO-2019-0318	GMO	Memorandum	Renewable Energy Standard
ER-2019-0335	Ameren	Cost of Service Report	Renewable Energy Standard, In- Service Criteria
EA-2019-0371	Ameren	Staff Report	Certificate of Convenience and Necessity
EO-2020-0329	Evergy Missouri Metro	Memorandum	Renewable Energy Standard
EO-2020-0330	Evergy Missouri West	Memorandum	Renewable Energy Standard
EE-2021-0237	Evergy Missouri Metro	Memorandum	Cogeneration Tariff
EE-2021-0238	Evergy Missouri West	Memorandum	Cogeneration Tariff
EE-2021-0180	Ameren Missouri	Memorandum	Electric Meter Variance
ET-2021-0151 and 0269	Evergy	Memorandum, Rebuttal Report	Transportation Electrification
AO-2021-0264	Various	Staff Report	February 2021 Cold Weather Event
EW-2021-0104	n/a	Staff Report	RTO Membership
EW-2021-0077	n/a	Staff Report	FERC Order 2222
EO-2021-0339	Evergy Missouri West	Memorandum	Territorial Agreement
GR-2021-0108	Spire	Rebuttal	Automated Meter Reading Opt-out Tariff

Sarah L.K. Lange

I received my J.D. from the University of Missouri, Columbia, in 2007, and am licensed to practice law in the State of Missouri. I received my B.S. in Historic Preservation from Southeast Missouri State University, and took courses in architecture and literature at Drury University. Since beginning my employment with the MoPSC I have taken courses in economics through Columbia College and courses in energy transmission through Bismarck State College, and have attended various trainings and seminars, indicated below.

I began my employment with the Commission in May 2006 as an intern in what was then known as the General Counsel's Office. I was hired as a Legal Counsel in September 2007, and was promoted to Associate Counsel in 2009, and Senior Counsel in 2011. During that time my duties consisted of leading major rate case litigation and settlement, and presenting Staff's position to the Commission, and providing legal advice and assistance primarily in the areas of depreciation, cost of service, class cost of service, rate design, tariff issues, resource planning, accounting authority orders, construction audits, rulemakings and workshops, fuel adjustment clauses, document management and retention, and customer complaints.

In July 2013 I was hired as a Regulatory Economist III in what is now known as the Tariff / Rate Design Department. In this position my duties include providing analysis and recommendations in the areas of RTO and ISO transmission, rate design, class cost of service, tariff compliance and design, and regulatory adjustment mechanisms and tariff design. I also continue to provide legal advice and assistance regarding generating station and environmental control construction audits and electric utility regulatory depreciation. I have also participated before the Commission under the name Sarah L. Kliethermes.

Presentations

Midwest Energy Policy Series – Impact of ToU Rates on Energy Efficiency (August 14, 2020) Billing Determinants Lunch and Learn (March 27, 2019)

Support for Low Income and Income Eligible Customers, Cost-Reflective Tariff Training, in cooperation with U.S.A.I.D. and NARUC, Addis Ababa, Ethiopia (February 23-26, 2016)

Fundamentals of Ratemaking at the MoPSC (October 8, 2014)

Ratemaking Basics (Sept. 14, 2012)

Participant in Missouri's Comprehensive Statewide Energy Plan working group on Energy Pricing and Rate Setting Processes.

Relevant Trainings and Seminars

Regional Training on Integrated Distribution System Planning for Midwest/MISO Region (October 13-15, 2020)

"Fundamentals of Utility Law" Scott Hempling lecture series (January – April, 2019)

Today's U.S. Electric Power Industry, the Smart Grid, ISO Markets & Wholesale Power Transactions (July 29-30, 2014)

MISO Markets & Settlements training for OMS and ERSC Commissioners & Staff (January 27–28, 2014)

Validating Settlement Charges in New SPP Integrated Marketplace (July 22, 2013)

PSC Transmission Training (May 14 – 16, 2013)

Grid School (March 4–7, 2013)

Specialized Technical Training - Electric Transmission (April 18–19, 2012)

The New Energy Markets: Technologies, Differentials and Dependencies (June 16, 2011)

Mid-American Regulatory Conference Annual Meeting (June 5–8, 2011)

Renewable Energy Finance Forum (Sept. 29–Oct 3, 2010)

Utility Basics (Oct. 14–19, 2007)

Testimony and Staff Memoranda

Company	Case No.
Evergy Affiliates	ET-2021-0151
In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Evergy Missouri West, Inc. d/b/a Evergy Missouri West for Apple Electrification Portfolio	
Spire Missouri, Inc. In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Author General Rate Increase for Natural Gas Service Provided in the C Service Areas	· ·
Union Electric Company d/b/a Ameren Missouri In the Matter of the Request of Union Electric Company d/b/a Amer Surge Protection Program	ET-2021-0082 ren for Approval of its

rage 5 of 0	Page	3	of	6
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Company Case No. Union Electric Company d/b/a Ameren Missouri GT-2021-0055 In the Matter of the Request of Union Electric Company d/b/a Ameren Missouri to Implement the Delivery Charge Adjustment for the 1st Accumulation Period beginning September 1, 2019 and ending August 31, 2020 The Empire District Electric Company ET-2020-0390 In the Matter of The Empire District Electric Company's Tariffs Approval of a Transportation Electrification Portfolio for Electric Customers in its Missouri Service The Empire District Electric Company ER-2019-0374 In the Matter of The Empire District Electric Company's Tariffs to Increase Its Revenues for Electric Service Union Electric Company d/b/a Ameren Missouri ER-2019-0335 In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service KCP&L Greater Missouri Operations Company ER-2019-0413 In the Matter of KCP&L Greater Missouri Operations Company Request for Authority to Implement Rate Adjustments Required by 4 CSR 240-20.090(8) And the Company's Approved Fuel and Purchased Power Cost Recovery Mechanism Union Electric Company d/b/a Ameren Missouri GR-2019-0077 In the Matter of of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Natural Gas Service Union Electric Company d/b/a Ameren Missouri ET-2019-0149 In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri **Revised Tariff Sheets** ET-2019-0029 The Empire District Electric Company In the Matter of The Empire District Electric Company's Revised Economic Development Rider Tariff Sheets The Empire District Electric Company ER-2018-0366 In the Matter of a Proceeding Under Section 393.137 (SB 564) to Adjust the Electric Rates of The Empire District Electric Company EA-2018-0202 Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility

<u>Company</u>	Case No.
Kansas City Power & Light Company KCP&L Greater Missouri Operations Company In the Matter of Kansas City Power & Light Company's Requ Implement a General Rate Increase for Electric Service	ER-2018-0145 ER-2018-0146 est for Authority to
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Approval of Efficient Electrification Program	ET-2018-0132 Ameren Missouri for
Union Electric Company d/b/a Ameren Missouri In the Matter of the Application of Union Electric Company d/b/a Approval of 2017 Green Tariff	ET-2018-0063 Ameren Missouri for
Laclede Gas Company Laclede Gas Company d/b/a Missouri Gas Energy In the Matter of Laclede Gas Company's Request to Increase I Service, In the Matter of Laclede Gas Company d/b/a Missouri Gas Increase Its Revenue for Gas Service.	
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Si Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0316 ide Investment Rider
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand Si Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2017-0167 ide Investment Rider
KCP&L Great Missouri Operations Company In the Matter of KCP&L Greater Missouri Operations Company's Ann Tariff Filing	ET-2017-0097 nual RESRAM
Grain Belt Express Clean Line, LLC In the Matter of the Application of Grain Belt Express Clean Line I of Convenience and Necessity Authorizing It to Construct, Own Manage, and Maintain a High Voltage, Direct Current Transm Associated Converter Station Providing an Interconnection of Montgomery 345 kV Transmission Line	n, Operate, Control, nission Line and an
Kansas City Power & Light Company In the Matter of Kansas City Power & Light Company's Demand St Rate Adjustment And True-Up Required by 4 CSR 240-3.163(8)	ER-2016-0325 ide Investment Rider

Page 5 of 6 Company Case No. Kansas City Power & Light Company 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 Union Electric Company d/b/a Ameren Missouri EA-2016-0207 In the Matter of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Offer a Pilot Subscriber Solar Program and File Associated Tariff Union Electric Company d/b/a Ameren Missouri ER-2016-0179 In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service KCP&L Great Missouri Operations Company 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 Empire District Electric Company ER-2016-0023 In the Matter of The Empire District Electric Company's Request for Authority to Implement a General Rate Increase for Electric Service Ameren Transmission Company of Illinois EA-2015-0146 In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri EA-2015-0145 Ameren Transmission Company of Illinois In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line in Marion County, Missouri and an Associated Switching Station Near Palmyra, Missouri Union Electric Company d/b/a Ameren Missouri EO-2015-0055 In the Matter of Union Electric Company d/b/a Ameren Missouri's 2nd Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA Kansas City Power & Light Company 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

<u>Case No.</u>

Empire District Electric Company

ER-2014-0351

In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area

Union Electric Company d/b/a Ameren Missouri

EC-2014-0316

City of O'Fallon, Missouri, and City of Ballwin, Missouri, Complainants v. Union Electric Company d/b/a Ameren Missouri, Respondent

Union Electric Company d/b/a Ameren Missouri

ER-2014-0258

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service

Union Electric Company d/b/a Ameren Missouri

EC-2014-0224

Noranda Aluminum, Inc., et al., Complainants, v. Union Electric Company d/b/a Ameren Missouri, Respondent

Grain Belt Express Clean Line, LLC

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

KCP&L Great Missouri Operations Company

EO-2014-0151

In the Matter of KCP&L Greater Missouri Operations Company's Application for Authority to Establish a Renewable Energy Standard Rate Adjustment Mechanism

Kansas City Power & Light Company

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 A Demand-Side Programs Investment Mechanism

Veolia Energy Kansas City, Inc.

HR-2014-0066

In the Matter of Veolia Energy Kansas City, Inc. for Authority to File Tariffs to Increase Rates

CREDENTIALS AND CASE PARTICIPATION OF SHAWN E. LANGE

PRESENT POSITION:

I am a Professional Engineer in the Engineering Analysis Department, Industry Analysis Division, of the Missouri Public Service Commission.

EDUCATIONAL BACKGROUND AND WORK EXPERIENCE:

In December 2002, I received a Bachelor of Science Degree in Mechanical Engineering from the University of Missouri, at Rolla now known as the Missouri University of Science and Technology. I joined the Commission Staff in January 2005. I am a registered Professional Engineer in the State of Missouri and my license number is 2018000230.

TESTIMONY FILED:

Case Number	Utility	Testimony	Issue
ER-2005-0436	Aquila Inc.	Direct	Weather Normalization
		Rebuttal	Weather Normalization
		Surrebuttal	Weather Normalization
ER-2006-0314	Kansas City Power &	Direct	Weather Normalization
	Light Company	Rebuttal	Weather Normalization
ER-2006-0315	Empire District	Direct	Weather Normalization
	Electric Company	Surrebuttal	Weather Normalization
ER-2007-0002	Union Electric Company d/b/a AmerenUE	Direct	Weather Normalization
ER-2007-0004	Aquila Inc.	Direct	Weather Normalization
ER-2007-0291	Kansas City Power &	Staff Report	Weather Normalization
	Light Company	Rebuttal	Weather Normalization
ER-2008-0093	Empire District Electric Company	Staff Report	Weather Normalization
ER-2008-0318	Union Electric Company d/b/a AmerenUE	Staff Report	Weather Normalization
ER-2009-0089	Kansas City Power & Light Company	Staff Report	Net System Input

Case Number	Utility	Testimony	Issue
ER-2009-0090	KCP&L Greater Missouri Operations Company	Staff Report	Net System Input
ER-2010-0036	Union Electric Company d/b/a AmerenUE	Staff Report	Net System Input
ER-2010-0130	Empire District	Staff Report	Variable Fuel Costs
	Electric Company	Surrebuttal	Variable Fuel Costs
ER-2010-0355	Kansas City Power & Light Company	Staff Report	Variable Fuel Costs
ER-2010-0356	KCP&L Greater Missouri Operations Company	Staff Report	Engineering Review- Sibley 3 SCR
ER-2011-0004	Empire District Electric Company	Staff Report	Variable Fuel Costs
ER-2011-0028	Union Electric Company d/b/a Ameren Missouri	Staff Report	Net System Input
ER-2012-0166	Union Electric	Staff Report	Weather Normalization
	Company d/b/a Ameren Missouri	Surrebuttal	Weather Normalization
			Maryland Heights In- Service
ER-2012-0174	Kansas City Power & Light Company	Staff Report	Weather Normalization Net System Input Variable Fuel Costs
		Surrebuttal	Weather Normalization
ER-2012-0175	KCP&L Greater Missouri Operations	Staff Report	Weather Normalization Net System Input
	Company	Surrebuttal	Weather Normalization
ER-2012-0345	Empire District	Rebuttal	Interim Rates
	Electric Company	Staff Report	Weather Normalization
EC-2014-0223	Noranda Aluminum v. Ameren Missouri	Rebuttal	Weather Normalization
EA-2014-0207	Grain Belt Express CCN	Rebuttal	Certificates of Convenience/Feasibility
		Surrebuttal	Analysis

Case Number	Utility	Testimony	Issue
ER-2014-0258	Union Electric Company d/b/a Ameren Missouri	Staff Report	Net System Input Variable Fuel Costs
ER-2014-0351	Empire District Electric Company	Staff Report	Net System Input Variable Fuel Costs
ER-2014-0370	Kansas City Power & Light Company	Staff Report	Net System Input Variable Fuel Costs
		True-up Direct	Variable Fuel Costs La Cygne In-service
EA-2015-0146	ATXI CCN	Rebuttal	Certificates of Convenience/Feasibility
		Surrebuttal	Analysis
ER-2016-0023	Empire District Electric Company	Staff Report	Net System Input Variable Fuel Costs
		Surrebuttal	Variable Fuel Costs
ER-2016-0179	Union Electric Company d/b/a Ameren Missouri	Staff Report	Variable Fuel Costs
EA-2016-0385	Grain Belt Express CCN	Rebuttal	Certificates of Convenience/Feasibility
		Surrebuttal	Analysis
ER-2018-0145	Kansas City Power & Light Company	Staff Report	Variable Fuel Costs Market Prices
		Rebuttal	Variable Fuel Costs Market Prices
		True-up Direct	Variable Fuel Costs Market Prices
EA-2018-0327	ATXI CCN	Rebuttal	Certificates of Convenience/Feasibility Analysis
EA-2019-0021	Ameren CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
EA-2019-0010	Empire District Electric Company CCN	Staff Report	Certificates of Convenience/Feasibility Analysis
EC-2020-0408	MLA v. Grain Belt Complaint	Staff Recommendation	Formal Complaint
EA-2021-0167	ATXI CCN	Staff Recommendation	Certificates of Convenience/Feasibility Analysis

Credentials and Background of

Seoung Joun Won, PhD

I am currently employed as a Regulatory Compliance Manager in the Financial

Analysis Department of the Financial and Business Analysis Division of the Missouri

Public Service Commission. I have been employed at the Missouri Public Service

Commission since May 2010.

I received my Bachelor of Arts, Master of Arts, and Doctor of Philosophy in

Mathematics from Yonsei University and my Bachelor of Business Administration in

Financial Accounting from Seoul Digital University in Seoul, South Korea, and earned my

Doctor of Philosophy in Economics from the University of Missouri - Columbia. Also,

I passed several certificate examinations for Finance Specialist in South Korea such as

Accounting Management, Financial Risk Manager, Enterprise Resource Planning

Accounting Consultant, Derivatives Investment Advisor, Securities Investment Advisor,

and Financial Planner.

Prior to joining the Commission, I taught both undergraduate and graduate level

mathematics at the Korean Air Force Academy and Yonsei University for 13 years.

I served as the director of the Education and Technology Research Center in NeoEdu for

5 years. Before starting my current position at the Missouri Public Service Commission,

I had served as a regulatory economist in Tariff/Rate Design Department.

My current duties at the Commission include financial analysis of rate of return and

cost of equity, valuation analysis on merger and acquisition, due diligence review and

supporting economic and statistical analysis.

Case No. EA-2021-00087

List of Previous Testimony Filed

Seoung Joun Won, PhD

Case Number	Company	<u>Issue</u>
GR-2021-0108	Spire Missouri, Inc.	Rate of Return, Capital Structure
WF-2021-0131	Raytown Water Company	Financing Authority
EA-2020-0371	Union Electric Co., d/b/a Ameren Missouri	Financial Ability
SR-2020-0345	Missouri American Water Company	Rate of Return, Capital Structure
WR-2020-0344	Missouri American Water Company	Rate of Return, Capital Structure
WR-2020-0264	Raytown Water Company	Rate of Return, Capital Structure
EF-2020-0301	Evergy Missouri Metro	Financing Authority
WR-2020-0053	Confluence Rivers Utility Operating Company, Inc.	Rate of Return, Capital Structure
HM-2020-0039	Veolia Energy Kansas City, Inc. AIP Project Franklin Bidco	Merger and Acquisition
EO-2019-0133	KCP&L Greater Missouri Operations Company, Evergy Metro	Business Process Efficiency
EO-2019-0132	Kansas City Power & Light Company, Evergy Metro	Business Process Efficiency
GO-2019-0059	Spire West, Spire Missouri, Inc.	Weather Variables
GO-2019-0058	Spire East., Spire Missouri, Inc.	Weather Variables
ER-2018-0146	KCP&L Greater Missouri Operations Co.	Weather & Normalization, Net System Input
ER-2018-0145	Kansas City Power & Light Co.	Weather & Normalization, Net System Input
GR-2018-0013	Liberty Utilities (Midstates Natural Gas) Corp.	Weather Variables

cont'd List of Previous Testimony Filed

Seoung Joun Won

Page 3 of 4

Case Number	<u>Company</u>	<u>Issue</u>
GR-2017-0216	Missouri Gas Energy (Laclede), Spire Missouri, Inc.	Weather Variables
GR-2017-0215	Laclede Gas Co., Spire Missouri, Inc.	Weather Variables
ER-2016-0285	Kansas City Power & Light Co.	Weather & Normalization, Net System Input
ER-2016-0179	Union Electric Co., d/b/a Ameren Missouri	Weather & Normalization, Net System Input
ER-2016-0156	KCP&L Greater Missouri Operations Co.	Weather & Normalization, Net System Input
ER-2016-0023	Empire District Electric Co.	Weather & Normalization, Net System Input
ER-2014-0370	Kansas City Power & Light Co	Weather & Normalization, Net System Input
ER-2014-0351	Empire District Electric Co.	Weather & Normalization, Net System Input
ER-2014-0258	Union Electric Co., d/b/a Ameren Missouri	Weather & Normalization, Net System Input
EC-2014-0223	Noranda Aluminum, Inc., et al, Complaint v. Union Electric Co., d/b/a Ameren Missouri	Weather Variables
GR-2014-0152	Liberty Utilities (Midstates Natural Gas) Corp.	Weather Variables
GR-2014-0086	Summit Natural Gas of Missouri, Inc.	Weather Variables
HR-2014-0066	Veolia Energy Kansas City, Inc.	Weather Variables, Revenue
GR-2013-0171	Laclede Gas Co.	Weather Variables
ER-2012-0345	Empire District Electric Co.	Weather Variables, Revenue
ER-2012-0175	KCP&L Greater Missouri Operations Co.	Weather Variables

cont'd List of Previous Testimony Filed

Seoung Joun Won

Page 4 of 4

Case Number	Company	<u>Issue</u>
ER-2012-0174	Kansas City Power & Light Co.	Weather Variables
ER-2012-0166	Union Electric Co., d/b/a Ameren Missouri	Weather Variables, Revenue
HR-2011-0241	Veolia Energy Kansas City, Inc.	Weather Variables
ER-2011-0004	Empire District Electric Co.	Weather Variables, Revenue
ER-2011-0028	Union Electric Co., d/b/a Ameren Missouri	Weather Variables, Revenue
GR-2010-0363	Union Electric Co., d/b/a Ameren Missouri	Weather Variables
ER-2010-0356	KCP&L Greater Missouri Operations Co.	Weather Variables
ER-2010-0355	Kansas City Power & Light Co.	Weather Variables, Revenue

Work Related Publication

Won, Seoung Joun, X. Henry Wang, and Henry E. Warren. "Climate normals and weather normalization for utility regulation." *Energy Economics* (2016).