**BEFORE THE PUBLIC SERVICE COMMISSION**
**OF THE STATE OF MISSOURI**

| | | |
|---|---|---|
| In the Matter of an Examination of Class Cost of Service and Rate Design in the Missouri Jurisdictional Electric Service Operations of Aquila, Inc., formerly known as UtiliCorp United Inc. | )<br>)<br>)<br>)<br>) | Case No. EO-2002-384 |

## PRE-HEARING BRIEF OF AQUILA, INC.

Aquila, Inc. ("Aquila" or "Company"), submits this Prehearing Brief to the Missouri Public Service Commission ("Commission") in accord with the Commission's Order Regarding Consolidation and Procedural Schedule, August 23, 2005.

Pursuant to that Order, Aquila provides this Prehearing Brief including a summary of the testimony that its three witnesses will provide, as well as the factual and legal conclusions that the testimonial and documentary evidence will support.

HISTORY OF CASE

This case began more than three years ago as a "spin-off" docket - growing out of the Commission's Order approving the Stipulation and Agreement in Aquila's 2001 electric rate Case No. ER-2001-672. The Order, issued on February 21, 2002, established the instant case to study, on a revenue neutral basis, Aquila's class cost-of-service ("COS"), to identify load characteristics and to develop revenue neutral shifts to properly balance class rates. Commission's Order Approving Stipulation and Agreement, February 28, 2002, ¶ 5; Unanimous Stipulation and Agreement, ¶ 12.

The Commission in its Order Approving Stipulation and Agreement effective February 28, 2002, made all of the parties to Case No. ER-2001-672 parties to Case

No. EO-2002-384. Those parties included: the Company, Missouri Joint Municipal Electric Utility Commission, the County of Jackson, the City of Kansas City, Sedalia Industrial Energy User's Association ("SIEUA"), United State Executive Agencies, the Office of the Public Counsel ("OPC"), and the Missouri Public Service Commission Staff ("Staff"). Subsequently in this proceeding the Commission in its Order Regarding Consolidation and Procedural Schedule issued August 23, 2005, ordered AARP[1], Calpine Central, L.P., City of St. Joseph, The Empire District Electric Company and the Missouri Department of Natural Resources to be added as parties to this case.

After the issuance of the Commission's February 21, 2002, Order, numerous technical conferences and other notable events between the parties[2] occurred. These included an Initial Technical Conference on September 18, 2002, and two Weather Normalization Conferences on March 4, 2003, and September 23, 2003. (J. Matt Tracy Direct, pg. 3, ln. 13 – 15). On November 12, 2003, a class load conference was held at which time Aquila's class load shapes were reviewed by the parties[3]. (J. Matt Tracy Direct, pg. 3, ln. 16 – 19).

On June 18, 2004, Aquila provided initial COS data to all parties, with updated COS being presented on May 6, 2005. (J. Matt Tracy Direct *Id.* at ln. 20 – 22; pg. 4, ln. 3). At this point in the process there were no criticisms or concerns expressed to the Company by any of the parties as to the load shapes presented by the Company. On

---

[1] AARP filed a Motion for Reconsideration on August 23, 2005 requesting the Commission reconsider its decision compelling AARP to involuntarily be a party in Case No. EO-2002-384.

[2] Parties include those parties of record prior to the Commission's Order Regarding Consolidation and Procedural Schedule, August 23, 2005.

[3] *Id.*

August 19, 2005, the Company provided proposed rate structure changes, billing units and related proof of revenue to all parties.

As this case began to wind down in late 2005, the parties after having filed direct testimony on September 19, 2005, participated in a Settlement Conference from September 26–28, 2005. The result of the Settlement Conference was a Public Hearing Notice and a List of Issues which were filed with the Commission by the Company and the Staff respectively. This lengthy, exhaustive and deliberative process has been diligently pursued by the Company, and now the parties are preparing for the Evidentiary Hearing scheduled for November 7-11, 2005.

<u>PURPOSE OF THE CASE</u>

This case was established to study, on a revenue neutral basis, Aquila's class cost-of service, to identify load characteristics and to develop revenue neutral shifts to properly balance class rates. <u>In light of the fact that this case is not a rate case</u>, despite efforts by some to make it into one, <u>it is important that the Commission not be unwittingly lured into considering issues which are not before them at this time</u>. This Commission, by timely issuing a decision in this case prior to issuing a decision in Case Nos. ER-2005-0436 and HR-2005-0450 can assuage any inferences which might be drawn that this case was <u>not</u> decided on its own merit but instead determined upon facts and evidence which are not yet before the Commission for consideration.

<u>AQUILA CLASS COST OF SERVICE</u>

It has been more than ten years since the Commission in Case No. ER-93-37 implemented the results of the last class cost-of-service study for Aquila MPS. Therefore it is worth noting that this Commission has not reviewed class cost-of-service and rate design for Aquila Networks – MPS ("MPS") and Aquila Networks – L&P ("L&P") for well over ten years, and that this case represents a fresh opportunity for the Commission to evaluate and adopt changes to both.

In that COS proceedings are less common before the Commission than general rate cases and may therefore represent less familiar territory for the Commission, Aquila is sensitive to the complexity of the issues involved in this type of proceeding and that a basic foundation for understanding what constitutes a COS study may be helpful for the Commission in processing this case. Therefore, the Company herein provides a basic description of what constitutes a class cost-of-service study. Additionally, the Company will outline for the Commission the testimony of its witnesses as well as the Company's recommendations and rationale for its recommendations. Ultimately the Company will explain why the Commission should move toward the results, or more specifically the "*destination*", of Aquila's COS study results, and not the "*destination*" advocated by others.

COS STUDY

A COS is a tool to help determine how much various groups of customers are contributing to a utility company's revenue requirement. This type of study is necessary in that the majority of the equipment and labor a utility expends is not devoted to a single customer. A company making a single product and selling it to a single customer has a fairly straightforward task – it must collect all of its expenses, including a profit, from that one customer. This is not possible for an electric utility whose resources provide service to more than a single customer.

Because of the unique characteristics of an electric utility, determining a price for customers individually would be a monumental task and would cost more to complete than the value it would provide. The task is made manageable by gathering customers into similar groups, or classes. Then the various expenses are accumulated into similar functions, classified by the *cause* of the expense, and assigned or allocated to classes of customers based on a variety of estimates.

Creation of a COS study essentially consists of a three-step process which results in rate base investment, operation and maintenance expenses, depreciation expenses and income taxes being assigned or allocated to customer classes. (David Stowe Direct, pg. 10, ln. 19 – 21). This fundamental COS three-step process is universally adopted in this case by Aquila, SIEUA, AG Processing, Inc., the Federal Executive Agencies ("FEA"), OPC and the Staff. Those steps are; (1) functionalization of costs, (2) classification of the functionalized costs; and (3) assignment or allocation of costs to the customer classes.

In order for a COS to be performed it is necessary that a utility collect, analyze and project data which includes; revenue and expense account data, identification of customer classes, class load data, development of test year supplemental class data, evaluation and assignment of allocation factors, and more.

The "function of a class cost-of-service study is to measure the cost responsibility of each rate class as a whole." (emphasis in original). (Janice Pyatte Direct, pg. 5, line 11 – 12). The COS study is meant to be a "best-effort estimate of revenue requirements by class." (J. Matt Tracy Direct, pg. 6, ln. 2). The completion of a COS study should serve as a "guide in setting revenue requirements and designing rates …"

(*Id.* at ln. 5 – 6). **It is readily conceded that this process is a combination of art and science.**

Customers with similar service requirements and usage characteristics are grouped into classes, and costs are assigned or allocated, as appropriate, to those classes. (David Stowe Direct, pg. 3, ln. 5 – 7).

Each of parties to the case separate customers into classes based upon their chosen method, and in some cases, classes have been grouped together where the applied method supports allocation of costs in one step. (David Stowe Direct, pg. 6, ln. 2 – 3; pg. 7, 4 – 6, pg. 7, ln. 17). Load research samples drawn from classes of customers are reviewed and evaluated to form load shapes. (*Id.* at pg. 9, ln. 4 – 5). The rate classes are grouped based upon customer load shapes. (*Id.* at 4 – 5). The formation of classes, or groups, is an area in which the parties may tend to disagree in this type of case.

Costs are assigned and allocated to broad customer classes depending upon whether a customer class is directly responsible for a cost, in which case costs are assigned, or whether costs are joint or common costs, in which case costs are allocated to each class based upon an allocation factor. (*Id.* at ln. 9 – 11). Which particular allocation method is applied serves as another basis for disagreement between the parties in this type of case.

Ultimately, the final result in this case, after examination of the class cost-of-service study and rate design case should be a Commission recommended design that balances the revenue collected from each class without changing the total revenue collected by Aquila.

AQUILA WITNESSES

Aquila will present three witnesses in support of its COS and proposed rate design. Herein follows an introduction to each witness and their proposed testimony.

1. J. Matt Tracy: Manager, Regulatory Services, Aquila

Mr. Tracy will offer testimony which provides a general description of cost-of-service ("COS"), the process, and why the Company chose the A&E-3CP demand allocator method. Witness Tracy will testify that a change to revenue collection from each customer class should be made, which should include rate design changes that reflect a more level rate of return for the Company. He will review the Company's recommendation which supports moving beyond simply collecting the correct total revenue from each customer class, to actually collecting the revenue based on the cost factors that caused them. He will offer testimony which supports collecting less of the customer and demand charges from energy in that failure to do so is inefficient and counterproductive.

Witness Tracy will explain the creation of the class load shapes that were used by the parties to create their respective demand allocators. He will further describe for the Commission the demand allocation methods, and why the Company's A&E-3CP method is most appropriate for allocating Production and Transmission expense.

Witness Tracy has prepared and will introduce specimen tariff sheets reflecting rate design changes suggested by Witness Gray's testimony on behalf of Aquila.

2. David L. Stowe, Senior Regulatory Analyst, Regulatory Services, Aquila.

Witness Stowe will also provide testimony describing the Company's COS study. He will provide detailed information regarding the source of input data, the special studies which enhanced the COS, and further describe the logic and assumptions of both. Witness Stowe will recommend to the Commission that the methods and results of the Company's COS be approved for use in Aquila's rate design.

Regarding input data, Witness Stowe will explain the source of the revenue and expense account data which were used in the COS studies, and will further highlight for the Commission that the revenue and expense data were derived from accounting schedules which were a part of the Settlement Agreement approved by the Commission in Case No. ER-2004-0034.

Witness Stowe will establish that the COS customer classes were specifically identified by the Company's Load Research department based upon each class' load shape. He will also review why and how class load data was increased to reflect line losses. Witness Stowe will further offer testimony which sets forth the basis for the line loss values and that they were based upon the work of a joint project by the Company's transmission and distribution engineers in 2002. He will also summarize the manner in which the current tariff rates are combined into COS classes and how those classes are combined into rate groups.

Witness Stowe will also provide testimony which describes the logic and method of developing a COS study as well as the specific details of the Company's COS. He will explain for the Commission when and where certain allocation factors might be used, and describe which allocation factors were used in the Company's studies. He will further offer testimony which illustrates the Company's understanding of the techniques and methods of COS studies.

Witness Stowe will provide a description of the two detailed and lengthy studies which were completed to enhance the COS studies. He will explain that a Distribution Study was completed to distinguish primary distribution costs from secondary distributions costs, and that a Zero Intercept study was completed to identify the customer costs and demand costs of certain distribution components. Witness Stowe will provide testimony which describes the results of the Distribution Study and specifically recommend that the Commission endorse the separation of primary distribution costs from secondary distribution costs and the use of the Zero Intercept method to classify certain primary and secondary distribution costs as demand and customer.

He will further describe the results of the Company's COS studies which are contained in Schedules DLS-3 through DLS-10, and ultimately urge the Commission to endorse the Company's COS studies. Lastly, Witness Stowe will describe the calculation of billing determinants for use in the proposed rate structure. He will explain that the Company used adjustment factors provided by Staff Witness Pyatte to best produce revenues by class from the previous rate case.

3. Charles R. Gray, Senior Regulatory Analyst, Regulatory Services, Aquila.

Company Witness Gray will offer testimony which provides proof of test year revenue, as well as test year billing determinants. Witness Gray will also introduce and endorse the Company's new rate design concepts. Witness Gray will support his testimony through schedules which highlight the Company's proposed rates on the proposed rate structures, as well as pricing out the test year billing determinants in the proposed rate structure. Witness Gray will conclude that the billing determinants on

Aquila's proposed structures collect the authorized revenue as shown in his offered schedules.

Witness Gray will explain how the proposed rate values and rate design were selected by the Company, and further explain Aquila's rate design philosophy as one where there is the creation of fair, competitive, consistent, and flexible rates that satisfy customers' needs while recovering and reflecting costs. He will illustrate for the Commission the complexity of rate design and that it can involve overlapping and sometimes conflicting factors.

In addition to testimony on rate design Witness Gray will describe the proposed changes to the L&P rate schedules, as well as the Large General Service rate switching, the proposed elimination of Time of Use Service, School and Church Service and Limited Demand Electric Space Heating General Service rate schedules, along with the addition of a Short Term Service tariff.

Witness Gray's testimony regarding MPS rate design will describe the addition of Residential Service – Other Use for MPS similar to the current L&P Residential-Other Use tariff. He will also describe the Company's proposed simplification of the rate structure for the Small General Service tariff and the reasons behind the consolidation proposed as to School and Church rate and Municipal Water Pumping and Lighting rates into a standard Small General Service rate. Additionally, Witness Gray will describe the Company's proposed changes to the Large General Service tariff and the reasons for the proposed elimination of the base/seasonal billing concept for all, but the largest customers. Lastly, Witness Gray will describe for the Commission the proposed elimination of Time of Use tariffs and the consolidation of the Modine Manufacturing tariff into a standard Large Power Service tariff.

POSITION OF THE COMPANY

Filed contemporaneously with this Prehearing Brief is a detailed statement of the position of the Company on the issues presented. It is the Company's position the COS it presents best reflects the costs that impact its system, and is therefore qualitatively superior to those offered by the other parties, and that the rate structure changes which the Company proposes are mutually beneficial to the customers of Aquila as well as the Company. The analogy that COS should be viewed as a *destination*, rather than a direction, has been used by the parties in this case.

It is the position of Aquila that its COS provides the best choice of *destination*. The Company's COS results set out the *destination* for rates. The implementation process would then involve *when* the move would occur, how close the move is to the *destination*, and how quickly the move occurs. Of course, the Commission could avoid selecting a *destination* in this case at all, but that would amount to the needless exertion of a tremendous amount of time, energy and effort by the parties, in the face of facts and evidence which will be presented which clearly support the need for a commitment to a new *destination*.

In this case, and in the facts and evidence which will be set out by the Company, it will become clear that class revenues should be moved to a new *destination*, and that the choice of that *destination* should be the one which is supported by the Company's COS method.

Shifts and changes in *destination* are also supported by the other parties, but unfortunately the OPC, the Staff and the witness for SIEUA, Ag Processing, Inc. and FEA in their proposals suggest that there should be modification of the rate shifts determined by the COS, which in essence change the *destination*, which even if their proposals are near the sought after *destination*, would fall short of making the full move.

These suggested modifications are intended to diminish the impact on various classes, and be beneficial to specific interests. While the Company appreciates the risk of rate shock which may occur, it is important to note that the Company suggests rate shock mitigation which would not modify the *destination*. The use of incremental movement toward the Company's proposed COS would achieve this result. By way of analogy, the scheduled travel to the *destination* might include two legs, with one stop along the way to the final stop. This approach does not alter the *destination*, permits implementation without modification, and does not leave the Company or its customers stranded at an intermediate stop somewhere short of the ultimate *destination*.

The Company herein attaches a chart depicting it recommendations and those of the other parties as EXHIBIT A to this Prehearing Brief.

<u>ISSUES</u>

The class cost of service issues in this case center around what should constitute the appropriate method for <u>allocating</u>; production/generation related costs to customer classes, transmission related costs to customer classes, distribution-related costs to customer classes, and administrative and general expenses to customer classes. In addition, the appropriate <u>classification</u> of distribution plant is also at issue. Rate design issues include whether or not inter-class revenue adjustments should be determined and implemented in this case, and if so what are the appropriate adjustments and method for determining them, what rate schedules should be combined, eliminated or added, what changes to the rate structures on each rate schedule are appropriate, as well as how the appropriate rate values for each rate schedule should be determined.

*Production and Transmission*

The Company, the OPC, the Staff, and SIEUA, Ag Processing, Inc. and the FEA disagree over the appropriate method which should be used as an allocator for Production and Transmission. The Company's selection of the A&E-3CP demand allocator for Production and Transmission is based upon the position that the 3CP allocator allows for the use of the three most similar values for creation of a combined value that is less subject to sampling errors, or the occasional eccentric behavior of a class, along with an A&E, which permits the assignment of some level of demand to the Lighting class, which notably has zero demand at the times of the 3CP. The addition of the A&E does not significantly change the other relative allocations. This method follows the characteristics of Aquila's system but does not provide a free pass for the Lighting class.

The Staff and OPC have chosen an allocator which will increase the cost responsibility for customers with the highest load factors, and decrease cost responsibility for customers with the lowest load factors. The Staff will offer what essentially is a hybrid of two fundamentally different allocation methods in this case. Specifically, Staff relies upon the TOU allocators even though the Staff did not complete the requisite analyses in this case.

The Company will demonstrate that the Staff has inappropriately attempted to allocate fixed, demand related costs based on capacity utilization, which directly contradicts Staff's very own classification of these costs. In addition, the Company will explain why the manner in which the Staff's TOU allocators are applied is inconsistent with typical capacity utilization techniques, and that for Staff's TOU method to be accurately applied would require datasets which are different than that which are used in this case.

In Company Surrebuttal Schedule JMT-2 the Company sets out load shapes which provide the foundation for demand allocation. This schedule makes clear that diversity of loads is valuable and that the impact on high and low load factor customers can be tremendous when an allocator is misapplied or poorly selected.

The demand allocator choices by Staff and OPC could ultimately result in low load factor customers increasing use and high load factor customers decreasing use, which will lower the system load factor, which then will ***increase costs to all customers***. The Company's choice of a demand allocator, which is less like Energy, but still far away from the extreme NCP, provides a more efficient price signal to customers, thus improving the system load factor, which in turn ***lowers the overall cost of providing electricity to all customers***. The Company suggests that the Commission reject the Staff and OPC Production and Transmission demand allocators in this case and instead adopt those used by the Company.

*Rate Structure*

The Company proposes a single rate structure for the majority of its customers in this case, with separate values for L&P and MPS, designed to send appropriate price signals to customers. In addition, the proposed rate structure adds simplification not only for Aquila field and call center personnel, but also to customers through rates which are easier to understand.

The Company will demonstrate that the results of its COS should be implemented in the June 2006, billing cycle, or alternatively, in a combination of the June and October 2006, billing cycles. The other parties point out *destinations* with their respective COS, but are unwilling to plan to arrive at those *destinations.* The Company will demonstrate that many of its existing rate schedules should be combined, others eliminated, and new ones added. The Company will demonstrate that its two existing rate structures for Small and Large General Service customers should be replaced with a single hours use structure that captures much of the price signal of the current structures in a more understandable and more easily administered manner. The Company will also demonstrate that the rate values it proposes in its rate structure are based on cost causation guidance from its COS results, constrained by collecting the revenue required from each class.

CONCLUSION

The Company's evidence supports the need for simplification, not only in rates, but in rate schedules, which provide more appropriate allocation of total costs of service and streamlining of the existing billing process. The evidence from the Company's witnesses, as well as the exhibits that the Company expects to be admitted, will compel the conclusion that after the Commission considers the Company's class COS, that it should be the study approved and the *destination* selected.

The Company's COS is a comprehensive framework that appropriately addresses the need for class adjustments and updated rate design in a fair and balanced manner and therefore should be adopted by this Commission.

Respectfully Submitted,

James C. Swearengen #21510
Janet E. Wheeler #52582
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
Telephone: (573) 635-7166
Facsimile: (573) 634-7431

ATTORNEYS FOR AQUILA, INC.

# EXHIBIT A
# COMPARISON OF RECOMMENDATIONS*

| MPS | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Aquila | | | | Staff | | | SIEUA/AG Processing/FEA | | | OPC | | | |
| MPS | ($) | (%) | | MPS | ($) | (%) | MPS | ($) | (%) | MPS | ($) | (%) | |
| RES-GEN | $15,898,191 | 13.09% | 8.22% | RES | $5,208,118 | 3.06% | RES | $15,767,357 | 9.27% | RES | ($352,310) | -0.20% | |
| RES-SH | ($1,911,037) | -3.93% | | | | | | | | | | | |
| SGS-S | ($5,185,134) | -9.64% | -9.66% | SGS | ($2,175,365) | -4.04% | SGS | ($5,457,184) | -10.13% | SGS S&C Muni | ($2,978,263) | -5.45% | |
| SGS-P | ($15,562) | -20.70% | | | | | | | | | | | |
| LGS-S | ($6,570,348) | -15.46% | -14.91% | LGS | ($3,969,094) | -8.98% | LGS | ($5,971,419) | -13.51% | LGS | ($1,517,050) | -3.38% | |
| LGS-P | ($18,370) | -4.27% | | | | | | | | | | | |
| LPS-S | ($2,249,538) | -8.62% | -6.86% | LPS | $651,854 | 1.28% | LP | ($4,375,026) | -8.56% | LPS | $4,714,387 | 9.07% | |
| LPS-P | ($1,255,689) | -5.03% | | | | | | | | | | | |
| OTHER | $44,097 | 7.82% | 7.82% | Other | $64,583 | 11.45% | SC | $36,272 | 14.16% | SC | $133,235 | 23.15% | |
| LIGHTS | $1,263,390 | 24.47% | 24.47% | Lighting | $219,904 | 4.26% | | | | | | | |

| L&P | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Aquila | | | | Staff | | | SIEUA/AG Processing/FEA | | | OPC | | | |
| L&P | ($) | (%) | | L&P | ($) | (%) | L&P | ($) | (%) | L&P | ($) | (%) | |
| RES-GEN | $1,676,021 | 7.88% | 6.88% | RES | $1,431,180 | 3.48% | RES | $5,572,654 | 13.56% | RES | $294,102 | 0.70% | |
| RES-H2O | $692,940 | 13.38% | | | | | | | | | | | |
| RES-HEAT | $465,482 | 3.15% | | | | | | | | | | | |
| SGS | ($936,669) | -12.34% | -12.34% | SGS | ($1,055,659) | -13.94% | SGS | ($1,112,518) | -14.69% | SGS | ($1,333,277) | -17.26% | |
| LGS-S | ($1,235,591) | -7.14% | -7.76% | LGS | ($1,624,995) | -9.17% | LGS | ($2,423,500) | -13.67% | LGS | ($948,679) | -5.23% | |
| LGS-P | ($124,253) | -59.37% | | | | | | | | | | | |
| LPS-S | ($80,977) | -0.42% | -1.48% | LPS | $1,144,552 | 4.99% | LPS | ($2,036,637) | -8.89% | LPS | $1,987,854 | 8.45% | |
| LPS-P | ($259,760) | -7.32% | | | | | | | | | | | |
| LIGHTS | ($197,193) | -8.79% | -8.79% | LIGHTS | $105,322 | 4.70% | | | | | | | |

* Update to David L. Stowe Surrebuttal Schedule, DLS-1.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 4th day of November, 2005, to the following:

Steve Dottheim/Nathan Williams
General Counsel's Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360

Lewis Mills
Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102-2230

Stuart Conrad
Finnegan, Conrad & Peterson
3100 Broadway, Suite 1209
Kansas City, MO 64111

Jeremiah Finnegan
Finnegan, Conrad & Peterson
3100 Broadway, Suite 1209
Kansas City, MO 64111

Major Craig Paulson
Federal Executive Agencies
139 Barnes Drive
Tyndall Air Force Base, FL 32403

Shelley Woods
Attorney General's Office
P.O. Box 899
Jefferson City, MO 65102

Mark Comley
Newman, Comley & Ruth
Monroe Bluff Executive Ctr.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537

John Coffman
1623 University Avenue
Columbia, MO 65201

Mr. Jeffrey Keevil
Stewart & Keevil
4603 John Garry Drive, Suite 11
Columbia, MO 65203

William Steinmeier
William D. Steinmeier, PC
2031 Tower Drive, P.O. Box 104595
Jefferson City, MO 65110

Judge Kevin Thompson
Missouri Public Service Commission
200 Madison Street, Suite 900
P.O. Box 360
Jefferson City, MO 65102-0360