

Exhibit No.:
Issues: Report on Revenue
Requirement Cost of Service,
Overview of Staff's Filing
Witness: Stephen M. Rackers
Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony
Case No.: GR-2010-0192
Date Testimony Prepared: June 4, 2010

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

DIRECT TESTIMONY

OF

STEPHEN M. RACKERS

ATMOS ENERGY CORPORATION

CASE NO. GR-2010-0192

Jefferson City, Missouri
June, 2010

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DIRECT TESTIMONY OF
STEPHEN M. RACKRS
ATMOS ENERGY, INC.
CASE NO. GR-2010-0192**

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

3 A. I have been employed by this Commission as a Utility Regulatory Auditor for
4 over 30 years, and have submitted testimony on revenue, expense, and rate base ratemaking
5 matters numerous times before the Commission. I have also been responsible for the
6 supervision of other Commission employees in rate cases and other regulatory proceedings
7 many times. I also participate in proceedings that involve the enforcement, interpretation and
8 writing of the Commission's rules. I have received continuous training at in-house and
9 outside seminars on technical ratemaking matters since I began my employment at the
10 Commission. My responsibilities auditing the books and records of the utilities regulated by
11 the Commission require that I review statutes applicable to the Commission or the utilities
12 regulated by the Commission, the Commission's rules, utility tariffs, contracts and other
13 documents relating to the utilities' operations.

14 Q. Have you participated in the Commission Staff's (Staff) audit of Atmos
15 Energy, Inc. (Atmos or Company) concerning its request for a rate increase in this
16 proceeding?

17 A. Yes, I have, with the assistance of the other members of the Staff. In addition,
18 the Staff has employed a consultant, Jim Dittmer from Utilitech, Inc. to provide accounting
19 services on its behalf. I am the Utility Services Division (Division) co-case coordinator
20 facilitating the work of the Division's Staff members, and I confer with Staff from other
21 Commission Divisions involved in the Staff's direct case.

22 **EXECUTIVE SUMMARY**

23 Q. Please summarize your direct testimony in this proceeding.

1 A. I am sponsoring the Staff's Revenue Requirement Cost of Service
2 Report (Report) that is being filed concurrently with this direct testimony. I also provide in
3 this direct testimony an overview of the Staff's revenue requirement determination.
4 The Staff has conducted a review of all the components (capital structure, return on rate base,
5 rate base, operating revenues and operating expenses) that determine the revenue requirement
6 of Atmos.

7 **REVENUE REQUIREMENT COST OF SERVICE REPORT**

8 Q. How is the Staff's Report organized?

9 A. The Staff's Report has been organized by topic as follows:

10 I. Executive Summary

11 II. Background

12 III. Test Year And True-Up Recommendation

13 IV. Major Issues

14 V. Rate of Return

15 VI. Development Of Accounting Schedules And Adjustments

16 VII. Allocations Of Corporate Costs

17 VIII. Income Statement

18 The Rate Base and Income Statement sections have several subsections that explain
19 each specific area and any adjustments made by the Staff to the twelve month test year
20 ending June 30, 2009. The respective Staff member, or consultant participating on its behalf
21 responsible for writing each specific section of the Report is identified and that person is the
22 Staff's expert/witness for that particular section of the Staff's Report. The affidavit of each
23 Staff member who contributed to the Report is included in an appendix to the Report.

1 The Staff would note that it may have different and or additional experts/witnesses when the
2 Staff files rebuttal and/or surrebuttal testimony in this rate proceeding.

3 **OVERVIEW OF STAFF'S RECOMMENDED REVENUE REQUIREMENT**

4 Q. In its audit of Atmos for Case No. GR-2010-0192, has the Staff examined all
5 of the cost of service components comprising the revenue requirement?

6 A. Yes.

7 Q. What are the cost of service components that comprise the revenue
8 requirement for a regulated investor owned public utility?

9 A. The revenue requirement for a regulated investor owned public utility can be
10 defined by the following formula:

11 Revenue Requirement = Cost of Providing Utility Service (i.e. Cost of Service)

12 **Or**

13 RR = O + (V-D)R; where,

14 RR = Revenue Requirement

15 O = Operating Costs (Payroll, Maintenance, etc.) Depreciation and
16 Taxes

17 V = Gross Valuation of Property Required for Providing Service
18 (including plant and additions or subtractions of other rate base
19 items)

20 D = Accumulated Depreciation Representing Recovery of Gross
21 Depreciable Plant Investment.

22 V-D = Rate Base (Gross Property Investment less Accumulated
23 Depreciation = Net Property Investment)

24 (V-D)R = Return Allowed on Rate Base (Net Property Investment)

1 The revenue requirement calculated by this formula represents the utility's total revenue
2 requirement. For ratemaking purposes, the revenue requirement generally refers to the
3 increase or decrease in revenue a utility needs as measured using the utility's existing rates
4 and the total cost of service.

5 Q. What is the objective of an audit of a regulated investor-owned public utility
6 for ratemaking purposes?

7 A. The objective of an audit is to determine the appropriate level of the
8 components identified in my previous answer in order to calculate the revenue requirement
9 for a regulated utility. All relevant factors are examined and a proper relationship of
10 revenues, expenses and rate base is maintained. The process for making that revenue
11 requirement determination can be summarized as follows:

12 1) Selection of a test year. The test year income statement represents the
13 starting point for determining a utility's existing annual revenues, operating costs and
14 net operating income. Net operating income represents the return on investment based upon
15 existing rates. The test year approved by the Commission for this case is the twelve months
16 ending June 30, 2009. "Annualization" and "Normalization" adjustments are made to the
17 test year results when the unadjusted results do not fairly represent the utility's most current
18 and ongoing annual level of revenues and operating costs. Annualization and normalization
19 adjustments are explained in more detail later in this Direct Testimony.

20 2) Selection of a "test year update period". A proper determination of revenue
21 requirement is dependent upon matching the components of rate base, return on investment,
22 revenues and operating costs at the same point in time. This ratemaking principle is
23 commonly referred to as the "matching" principle. It is a standard practice in ratemaking in

1 Missouri to utilize a period beyond the established test year for a case in which to match the
2 major components of a utility's revenue requirement. It is necessary to update test year
3 financial results to reflect information beyond the established test year in order to set rates
4 based upon the most current information that can be subjected to an audit. The update period
5 that was agreed to and established for this particular case is the eight months ending
6 February 28, 2010. The Staff's direct case filing represents a determination of a
7 revenue requirement based upon known and measurable results for major components of the
8 Company's operations as of February 28, 2010.

9 3) Selection of a "true-up date" or "true-up period". A true-up date generally
10 is established when a significant change in a utility's cost of service occurs after the end of
11 the update period. The type of cost included is one the parties and/or the Commission have
12 decided should be considered for cost of service recognition in the current case. In this
13 proceeding, the Company did not request a true-up audit be performed and the Commission
14 has not reserved time for a true-up hearing.

15 4) Determination of Rate of Return. A cost of capital analysis is performed to
16 determine a fair rate of return on investment to be allowed on Atmos' net investment
17 (rate base) used in the provision of utility service. Staff witness Zephania Marevangepo, of
18 the Commission's Financial Analysis Department has performed a cost of capital analysis for
19 this case and is sponsoring a section of the Staff's Revenue Requirement Cost of Service
20 Report to explain and provide the results of his analysis.

21 5) Determination of Rate Base. Rate Base represents the utility's net
22 investment used in providing utility service. For its direct filing, the Staff's consultant

1 Jim Dittmer of Utilitech, Inc. has determined Atmos' rate base as of February 28, 2010,
2 consistent with the end of the test year update period established for this case.

3 6) Net Operating Income From Existing Rates. The starting point for
4 determining net income from existing rates is the unadjusted operating revenues, expenses,
5 depreciation, and taxes for the test year which is the twelve-month period ending
6 June 30, 2009, for this case. All of the utility's specific revenue and expense categories are
7 examined to determine whether the unadjusted test year results require adjustments in order
8 to fairly represent the utility's most current level of operating revenues and expenses.
9 Numerous changes occur during the course of any year that will impact a utility's annual
10 level of operating revenues and expenses. The June 30, 2009 test year has been adjusted to
11 reflect the Staff's determination of the appropriate ongoing levels of revenues and expenses
12 and updated for all known and measurable changes to major components of the Company's
13 operations through February 28, 2010.

14 7) Determination of Net Operating Income Required. The net income
15 required for Atmos is calculated by multiplying the Staff's recommended rate of return by
16 the rate base. Net income required is then compared to net income available from existing
17 rates as discussed in item 6 above. The difference, when factored up for income taxes,
18 represents the incremental change in the Company's rate revenues required to cover its
19 operating costs and provide a fair return on investment used in providing gas service.

20 If a utility's current rates are insufficient to cover its operating costs and a fair
21 return on investment, the comparison of net operating income required (Rate Base Times
22 Recommended Rate of Return) to net income available from existing rates (Operating
23 Revenue less Operating Expense, Depreciation Expense and Income Taxes) will result in a

1 positive amount which would indicate the utility requires a rate increase. If the comparison
2 results in a negative amount, this indicates that the utility's current rates may be excessive.

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

5 A. The types of adjustments made are as follows:

6 1) Normalization adjustments. Utility rates are intended to reflect
7 normal ongoing operations. A normalization adjustment is required when the test year
8 reflects the impact of an abnormal event. One example of this type of adjustment that
9 is made in all gas rate cases is the Staff's revenue adjustments to normalize weather.
10 Actual weather/climate (weather) conditions during the test year are compared to 30 year
11 normal temperature values. The weather normalization adjustment restates the test year sales
12 volumes and revenue levels to reflect normal weather conditions.

13 2) Annualization adjustments. Annualization adjustments are required
14 when changes have occurred during the test year, update and/or true-up period, which are not
15 fully reflected in the unadjusted test year results. For example, a portion of
16 Atmos' employees received a wage increase during the test year. As a result, only a portion
17 of the twelve months ending June 30, 2009 reflects the impact of this payroll increase.
18 An annualization adjustment was made to capture the full financial impact of the payroll
19 increase for the portion of the test year prior to the time of the wage increase.

20 3) Disallowance adjustments. Disallowance adjustments are made to
21 eliminate costs in the test year results that are not considered appropriate for recovery from
22 ratepayers. An example of this is incentive compensation costs. In the Staff's view, these
23 costs are incurred to primarily benefit shareholder interests, and it is not appropriate to pass

1 these costs along to customers in rates. Therefore, these costs should be eliminated from the
2 cost of service borne by ratepayers, and the Staff has proposed to disallow these costs from
3 recovery in rates.

4 4) Proforma adjustments. Proforma adjustments reflect the impact of
5 items and events that occur subsequent to the test year. These items or events significantly
6 impact the revenue, expense and rate base relationship and should be recognized to address
7 the forward-looking objective of the test year. Caution must be taken when recognizing
8 proforma adjustments to ensure that all items and events subsequent to the test year are
9 examined to avoid not recognizing offsetting adjustments. In addition, some post-test year
10 items and events may not have occurred yet and/or may not have been sufficiently measured.
11 As a result, quantification of some proforma adjustments may be more difficult than for
12 others. A true-up audit that considers a full range of items and events that occur subsequent
13 to the test year attempts to maintain the proper relationship among revenues, expenses and
14 investment and should also address the difficulty in quantification associated with making
15 proforma adjustments.

16 Q. What rate increase amount did the Company request from the Commission in
17 this case?

18 A. The Company requested that its annual revenues be increased by
19 approximately \$6.4 million based on a return on equity (ROE) of 10.9%. The Staff notes that
20 effective March 5, 2010 the Company began recovering approximately \$1 million in annual
21 revenues through its current Infrastructure System Replacement Surcharge (ISRS) as
22 approved by this Commission. As discussed in greater detail later in this testimony, Staff did

1 not annualize the ISRS rates that were effective March 5, 2010 when calculating revenues at
2 existing rates.

3 Q. What is the Staff's recommended revenue requirement for Atmos at the time
4 of this revenue requirement direct filing?

5 A. The results of the Staff's audit of Atmos' rate increase request can be found in
6 the Staff's Accounting Schedules and is summarized on Accounting Schedule 1, Cost of
7 Service and Revenue Deficiency. This Accounting Schedule shows that the Staff's
8 recommended revenue requirement for Atmos in this proceeding ranges from approximately
9 \$4.6 million to \$5.1 million.

10 Q. What is the weighted cost of capital the Staff recommending in this case?

11 A. The Staff is recommending an ROE range of 8.95% to 9.95% with a midpoint
12 of 9.45%, as calculated by Staff Witness Marevangepo. The Staff's recommended capital
13 structure for Atmos is 50.97% common stock equity, 47.50% long-term debt and 1.53%
14 short-term debt. Based upon this capital structure the Staff's resulting cost of capital to apply
15 to rate base is in the range of 7.81% to 8.32% with a midpoint value of 8.06%. The Staff's
16 recommended weighted cost of capital is explained in more detail in Section V of the Staff's
17 Cost of Service Report.

18 Q. What items are included in the Staff's recommended rate base in this case?

19 A. Rate base items were determined as of the update period ending
20 February 28, 2010, either through a balance on the Company's books as of that date, a
21 13-month average balance ending on February 28, 2010, or a cash working capital lead lag
22 analysis. These rate base items include:

- 23 • Net Plant in Service
- 24 • Accumulated Deferred Income Tax

- 1 • Customer Advances for Construction
- 2 • Customer Deposits
- 3 • Miscellaneous Rate Base Offsets
- 4 • Storage Gas
- 5 • Prepaid Pension Asset
- 6 • Prepayments
- 7 • Fuel Stock
- 8 • Cash Work Capital Requirement
- 9 • ANG Acquisition Credit

10 Q. What are the significant income statement adjustments the Staff made in
11 determining Atmos revenue requirement for this case?

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

13 **Operating Revenues**

14 Retail Revenues were adjusted for the elimination of ISRS surcharges, customer
15 growth/decline, load changes, rate switching and weather normalization.

16 **Depreciation and Amortization**

17 Depreciation expense was annualized based upon the plant in service as of
18 February 28, 2010 and the current authorized depreciation rates. The reserve amortization
19 approved in Atmos' previous rate case was also eliminated as was agreed to by several
20 parties in a stipulation reached within Case No. GE-2009-0443.

21 **Payroll, Payroll Taxes and Employee Benefits**

22 Payroll expense was annualized on the basis of the current wage levels as of
23 February 28, 2010. Payroll taxes and all non-pension and non-OPEB related payroll benefits

1 were annualized as of February 28, 2010. Staff also disallowed all incentive compensation
2 programs, each of which are based on earnings.

3 **Other Non-Labor Expenses**

- 4 • Bad Debt Expense (Uncollectibles)
- 5 • Disallowance of advertising, dues and donations
- 6 • Elimination of non-recurring manufactured gas plant environmental costs
- 7 • Rate case expense
- 8 • Reallocation of corporate costs

9 Q. What reliance did you place on the work or conclusions of other
10 Staff members involved in the case?

11 A. I relied on the work from numerous other Staff members and Jim Dittmer, a
12 consultant working on Staff's behalf, in calculating a revenue requirement for Atmos in this
13 case. Weather normalized sales and the recommended ROE are just two examples of data
14 and analysis supplied to the Auditing Department as inputs into the Staff's revenue
15 requirement cost of service calculation. Affidavits and the qualifications for all
16 Staff members and the consultant working on Staff's behalf who are responsible for sections
17 of the Staff's Revenue Requirement Cost of Service Report are attached as an appendix to
18 the Report. Further, the individual who is responsible for a section of the Staff's Revenue
19 Requirement Cost of Service Report is identified at the conclusion of the section he or she
20 authored as being the Staff expert/witness responsible for that section.

21 Q. What are the biggest differences between the rate increase request filed by the
22 Company and the Staff revenue requirement recommendations being filed in this
23 proceeding?

1 A. There are seven primary revenue requirement differences between Staff and
2 Company.

- 3 • Return on Equity
- 4 • Rate Base
- 5 • Reallocation of Corporate Cost
- 6 • Employee Benefits
- 7 • Incentive Compensation
- 8 • Supplemental Executive Benefits Plan
- 9 • Rate Case Expense

10 While there are fairly significant differences between Company's and Staff's calculations of
11 the revenue deficiency in the categories of "Employee Benefits" and "Rate Case Expense,"
12 most of those differences relate to merely correcting calculation errors included within the
13 Company's filing.

14 Q. Are there other differences in the Staff's and the Company's revenue
15 requirement presentation?

16 A. Yes. The Company has annualized ISRS revenues and included this amount
17 in the calculation of revenue requirement. This presentation has the effect of showing how
18 much of an increase Atmos is recommending above the total rates, both permanent and
19 interim ISRS, that were being charged to ratepayers at the time of the Company's filing.
20 However, the increase in permanent rates will be larger than depicted by the Company, since
21 the interim ISRS rates will be reset to zero and the associated revenue requirement will be
22 collected through permanent/base rates. Staff's presentation of revenue requirement
23 eliminates the interim ISRS revenues, thus showing the entire increase in permanent/base

1 rates as its calculation of the revenue requirement in this case. Therefore, the Staff's revenue
2 requirement is approximately \$394,000 higher than the Company's as a result of the
3 difference in the treatment of ISRS rates. Staff views this as a difference in presentations
4 rather than an issue between itself and the Company.

5 In addition, both the Company and the Staff are supporting a shift in the
6 rate classes between small, medium and large general service. This shift results in a
7 reduction in the amount of revenue collected from the general service class as a whole. The
8 Company has not shown this shift in the determination of revenue requirement at existing
9 rates, while within its calculations the Staff has made specific revenue adjustments to capture
10 the expected loss in revenues as customers who, after tariff eligibility changes are
11 implemented, can be expected to transfer to lower priced base tariffs. As a result the
12 Staff's revenue requirement is approximately \$472,000 higher than the Company's due to the
13 difference in how the shift in the general service class is reflected.

14 To summarize, Staff's calculated revenue deficiency does not reflect
15 annualized ISRS revenues that were included within Atmos' calculation of revenue
16 requirement, and additionally, captures the impact of lost revenues expected to result when
17 eligibility for service under general service tariff changes are modified. I again emphasize
18 that these represent differences in "presentation" which do not reflect conceptual issues
19 between Company and Staff.

20 Q. Is it possible that significant differences exist between the Staff's revenue
21 requirement positions and those of other parties to the case besides Atmos in this proceeding?

22 A. Yes. However, the other parties to the case are filing their direct testimony
23 concurrent in timing with the Staff's direct filing. Until the Staff has an opportunity to

1 examine the direct testimony filed by the other parties, it is impossible to determine what
2 differences exist and how material they may be at this time.

3 Q. Please identify the Staff experts/witnesses responsible for addressing each
4 area where there is a known and significant difference between the Staff and the Company
5 that is addressed in this direct testimony or in the Staff Report in Section IV, Major Issues.

6 A. The Staff experts/witnesses for each listed issue are as follows:

7	<u>Issue</u>	<u>Staff Witness</u>
8	Return on Equity/Rate of Return	Zephania Marevangepo
9	Rate Base	Jim Dittmer
10	Reallocation of Corporate Cost	Jim Dittmer
11	Employee Benefits	Jim Dittmer
12	Incentive Compensation	Jim Dittmer
13	Supplemental Executive Benefits Plan	Jim Dittmer
14	Rate Case Expense	Jim Dittmer

15 Q. When will the Staff be filing its customer class cost of service/rate design
16 direct testimony and report in this proceeding?

17 A. The Staff's direct testimony and customer class cost of service/rate design
18 report will be filed on June 18, 2010.

19 Q. Does this conclude your direct testimony?

20 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

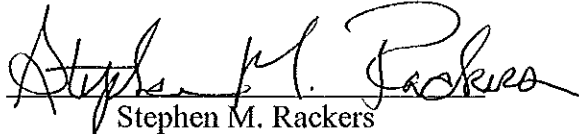
In the Matter of Atmos Energy Corporation's)
Tariff Revision Designed to Implement a)
General Rate Increase for Natural Gas Service)
in the Missouri Service Area of the Company.)

Case No. GR-2010-0192

AFFIDAVIT OF STEPHEN M. RACKERS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

Stephen M. Rackers, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Direct Testimony in question and answer form, consisting of 15 pages to be presented in the above case; that the answers in the foregoing Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.


Stephen M. Rackers

Subscribed and sworn to before me this 4th day of June, 2010.

NIKKI SENN
Notary Public - Notary Seal
State of Missouri
Commissioned for Osage County
My Commission Expires: October 01, 2011
Commission Number: 07287016


Notary Public

Regulatory Case Proceeding Participation

Stephen M. Rackers

Issue	Case Number	Exhibit	Case Name
Interim Rates	ER-2010-0036	Direct, Rebuttal, Surrebuttal, True-Up	Union Electric Company d/b/a AmerenUE
Revenue Requirement Cost Of service Report, Taum Sauk Capacity Sales, Nuclear Plant Licensing	ER-2008-0318	Direct, Surrebuttal	Union Electric Company d/b/a AmerenUE
True-Up, Income Taxes, MGP Sites, Other Rates Base Items, Revenue Requirement and OPEB	GR-2007-0387	Direct, Rebuttal	ATMOS Energy Corporation
True-up, Security AAO, Joplin Surcharge	WR-2007-0216	Direct, Rebuttal, Supplemental True-up Direct	Missouri-American Water Company
Income Taxes, Accumulated Deferred Income Taxes in Rate Base, Taum Sauk Generating Plant, Pinckneyville and Kinmundy Generating Plants, Accumulated Income Deferred Income Tax Balance, Income Tax Expense	ER-2007-0002	Direct, Rebuttal, Surrebuttal	Union Electric Company d/b/a AmerenUE
Revenue-Requirement, True-up, Income Taxes, MGP Sites, Other Rate Base Items, OPEBs	GR-2006-0387	Direct, Rebuttal	ATMOS Energy Corporation
Affidavit in Support of the Stipulation and Agreement on various issues.	GR-2005-0284	Stipulation and Agreement	Laclede Gas Company
ISRS Income Taxes	GO-2004-0443	Direct	Laclede Gas Company
St. Joseph Treatment Plant, AAOs, Depreciation, Transaction Costs, Old St. Joseph Treatment Plant, Security Accounting Authority Order, Acquisition Adjustments	WC-2004-0168	Direct, Surrebuttal	Missouri-American Water Company
Security AAO, Recovery Of Undepreciated Plant Balances and Acquisition Adjustments	WR-2003-0500	Direct, Surrebuttal	Missouri-American Water Company
Transaction Costs, Depreciation, AAO's, Acquisition Adjustment, Security Accounting Authority Order, Old St. Joseph Treatment Plant	WR-2003-0500	Direct, Surrebuttal	Missouri-American Water Company
Financial Aspects	GT-2003-0117	Direct	Laclede Gas Company

Regulatory Case Proceeding Participation

Stephen M. Rackers

Issue	Case Number	Exhibit	Case Name
Copper Surveys, Net Salvage Expense, Environmental Cost, Test Year & True-Up, Accounting Authority Orders, Laclede Pipeline, Safety and Copper Service Replacement Program	GR-2002-356	Direct, Rebuttal, Surrebuttal	Laclede Gas Company
Purchase Power	ER-2002-217	Direct	Citizens Electric Corporation
Income Taxes, Pension Liability	EC-2002-1025	Direct	Union Electric Company d/b/a AmerenUE
Pension Liability, Income Tax Expense, Deferred Income Taxes, Income Tax Expense, Deferred Income Taxes – Rate Base Offset, Pension Liability, Income Taxes, Territorial Agreements	EC-2002-1	Direct, Surrebuttal	Union Electric Company d/b/a AmerenUE
Incentive Compensation, Post-Retirement Benefits Other than Pensions, Prepaid Pension Assets, Pensions	GR-2001-629	Direct	Laclede Gas Company
Application Recommendation	GM-2001-342	Rebuttal	Laclede Gas Company
Merger Recommendation, Cost Allocation Manual	WM-2001-309	Rebuttal, Surrebuttal	Missouri-American Water Company, et al
Merger Cost and Savings, Infrastructure Replacement Deferrals, Income Taxes, Net Salvage Expense, Revenue Requirement, Merger Costs and Savings, Accounting Authority Orders (AAO's), Infrastructure Replacement, Depreciation	WR-2000-844	Direct, Rebuttal, Surrebuttal	St. Louis County Water Company
Pension Liability, AFUDC, Deferred OPEB Asset, Pension Expense – FAS 87, New St. Joseph Treatment Plant Phase-In, OPEBS – FAS 106, Phase-In, Accounting Authority Order, Phase-In	SR-2000-282	Direct, Rebuttal, Surrebuttal	Missouri-American Water Company
Staff's Explanation and Rationale for Supporting the Stipulation Agreement	WR-2000-281	Direct in Support of Stipulation Agreement	Missouri-American Water Company
Pension Expense-FAS 87, Pension Liability, AFUDC, Deferred OPEB Asset, New St. Joseph Treatment Plant Phase-In, OPEBS-FAS 106, Accounting Authority Order, Phase-In, St. Joseph Treatment Plant	WR-2000-281	Direct, Rebuttal, Surrebuttal	Missouri-American Water Company

Regulatory Case Proceeding Participation

Stephen M. Rackers

Issue	Case Number	Exhibit	Case Name
Staff's Explanation and Rationale for Supporting the Stipulation Agreement	SR-2000-282	Direct in Support of Stipulation Agreement	Missouri-American Water Company
Territorial Agreements	EO-99-599	Rebuttal	Union Electric Company / Ozark Border Electric Cooperative
Safety Deferral, FAS 87, FAS 88, FAS 106, Prepaid Pension Asset, Environmental Cost, Computer Cost, Supplemental Pension, Accounting Authority Orders	GR-99-315	Direct, Rebuttal, Surrebuttal	Laclede Gas Company
Main Replacement Program, Order-Infrastructure, Accounting Authority, Main Replacement Programs	WO-98-223	Direct	St. Louis County Water Company
Lease Classification & Terms	WA-97-46	Rebuttal	Missouri-American Water Company
Amortization of Depreciation Reserve Deficiency, Appointment Meter Reading, Main Incident Expense, Income Tax, Infrastructure Replacement Deferral, Property Tax	WR-97-382	Direct	St. Louis County Water Company
Lease Classification & Terms	WF-97-241	Rebuttal	Missouri-American Water Company
Income Tax, Territorial Agreement, Overview, Income Taxes, Alternative Regulation Plan and Agreements, Pension Liability	EM-96-149	Direct, Surrebuttal	Union Electric Company
Overview, Income Tax, Territorial Agreements, Alternative Regulation Plan and Agreement	EO-96-14	Direct, Surrebuttal	Union Electric Company