

Exhibit No.:
Issue(s):
Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

Rate Case Expense
Roth/Surrebuttal
Public Counsel
ER-2012-0345

SURREBUTTAL TESTIMONY

OF

KERI ROTH

Submitted on Behalf of the Office of the Public Counsel

EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2012-0345

February 4, 2013

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


In the Matter of The Empire District)
Electric Company of Joplin, Missouri)
Tariffs Increasing Rates for Electric) File No. ER-2012-0345
Service Provided to Customers in the)
Missouri Service Area of the Company)

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Keri Roth, of lawful age and being first duly sworn, deposes and states:

1. My name is Keri Roth. I am a Public Utility Accountant I for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.




Keri Roth
Public Utility Accountant I

Subscribed and sworn to me this 4th day of February 2013.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2013
Cole County
Commission #09754037



Jerene A. Buckman
Notary Public

My Commission expires August, 2013.

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**SURREBUTTAL TESTIMONY
OF
KERI ROTH**

**EMPIRE DISTRICT ELECTRIC COMPANY
CASE NO. ER-2012-0345**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Keri Roth, PO Box 2230, Jefferson City, Missouri 65102-2230.

Q. ARE YOU THE SAME KERI ROTH THAT HAS PREVIOUSLY FILED DIRECT
AND REBUTTAL TESTIMONY IN THIS CASE?

A. Yes.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of this Surrebuttal Testimony is to provide an update of revisions made to
rate case expense recommended in my Direct and Rebuttal testimony.

III. RATE CASE EXPENSE

1 Q. WHAT IS THE AMOUNT OF RATE CASE EXPENSE COMPANY HAS PAID TO-
2 DATE?

3 A. The most recent response to MPSC Staff Data Request No. 73 states as of the end of
4 December 2012 Company has paid invoices totaling \$228,401.17.

5
6 Q. HAVE YOU REVIEWED COMPANY'S ESTIMATED COSTS TO DEVELOP AND
7 PROCESS THE INSTANT CASE?

8 A. Yes. The Rate Case Expense workpaper provided by Company identified the estimated
9 cost of the instant case as \$500,000.

10
11 Q. PLEASE SUMMARIZE THE PUBLIC COUNSEL'S POSITION ON THIS ISSUE.

12 A. Public Counsel believes that the amount of rate case expense included in the development
13 of the Company's rates should only include a normalized annual level of charges.

14
15 Q. WHAT IS THE ANNUALIZED AMOUNT OF RATE CASE EXPENSE YOU ARE
16 PROPOSING THAT THE COMPANY RECEIVE?

17 A. As of the time this testimony is given, the Company has incurred rate case expense costs
18 of \$228,401.17 through December 2012. The amount of rate case expense Public
19 Counsel is proposing is \$114,200.59, based on a two-year normalization.

1

2 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

3 A. Yes, it does.