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Issues: Company Background, Customer
Experience, Bill Payment, Merger
Stipulations, Company Witnesses
Witness: Brent Baker
Type of Exhibit: Direct Testimony
Sponsoring Party: The Empire District
Electric Company
Case No.: ER-2019-0374
Date Testimony Prepared: August 2019

**Before the Public Service Commission
of the State of Missouri**

Direct Testimony

of

Brent Baker

on behalf of

**The Empire District Electric Company
a Liberty Utilities Company**

August 2019



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OF
BRENT BAKER
THE EMPIRE DISTRICT ELECTRIC COMPANY
BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION
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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Brent Baker. My business address is 602 South Joplin Avenue, Joplin,
4 Missouri.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Liberty Utilities Service Corp. as the Vice President of National
7 Customer Experience for Liberty Utilities, which owns regulated electric, natural gas,
8 water and wastewater utilities operating in three regions across the United States – the
9 East, Central and West Regions. As Vice President of National Customer
10 Experience, I am responsible for customer engagement strategy and execution
11 including operation of call centers, billing, metering, revenue assurance, local offices,
12 key account services, energy efficiency, and communications.

13 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

14 A. I am testifying on behalf of The Empire District Electric Company, a Liberty Utilities
15 Company (“Liberty-Empire” or “Company”).

16 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL
17 BACKGROUND.**

18 A. I graduated from Missouri University of Science and Technology (formerly,
19 University of Missouri – Rolla) in 2002 with a Bachelor of Science degree in Civil

1 Engineering. I began my employment with Empire in May 2002. I have held various
2 positions at Liberty-Empire, including Structural Engineer in the Line Engineering
3 department, Manager of Distribution Design, Director of Customer Service, and Vice
4 President of Customer Service, Transmission and Engineering prior to assuming my
5 present position with Liberty Utilities.

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC**
7 **SERVICE COMMISSION OR ANY OTHER REGULATORY AGENCY?**

8 A. Yes, I have testified before this Commission as well as before the Kansas Corporation
9 Commission and the Oklahoma Corporation Commission.

10 **II. PURPOSE**

11 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
12 **PROCEEDING?**

13 A. The purpose of my direct testimony is to provide background information on the
14 Company, discuss the rate relief requested by the Company in this case, describe the
15 Company's commitment to the customers we serve, describe the elimination of
16 customer payment fees associated with online credit and debit card ("card")
17 payments, address certain provisions in the stipulations and agreements in the merger
18 docket involving the Company's acquisition by Liberty Utilities (Commission Case
19 No. EM-2016-0213), and introduce the Company witnesses appearing in this case.

20 **III. BACKGROUND ON THE COMPANY AND THE CUSTOMER**

21 **EXPERIENCE**

22 **Q. PLEASE PROVIDE A BRIEF BACKGROUND ON THE COMPANY'S**
23 **SERVICE AREA IN MISSOURI.**

1 A. Liberty-Empire provides electric service in an area of approximately 10,000 square
2 miles in southwest Missouri and the adjacent corners of the states of Arkansas,
3 Oklahoma, and Kansas. Liberty-Empire's operations are regulated by the utility
4 regulatory commissions of these four states, as well as by FERC. Liberty-Empire's
5 service area encompasses 133 incorporated communities in 26 counties in the four-
6 state area. Most of the communities in the Company's service area are small, with
7 only 35 containing a population in excess of 1,500. Only 12 communities have a
8 population in excess of 5,000, and the largest city, Joplin, Missouri, has a population
9 of approximately 50,000. As of March 31, 2019, in Missouri, Liberty-Empire served
10 approximately 155,000 customers. The economy in the Company's service area is
11 diversified, and includes small to medium manufacturing operations, medical,
12 agricultural, entertainment, tourism, and retail interests.

13 **Q. HAS THE COMPANY'S OWNERSHIP CHANGED SINCE ITS LAST RATE**
14 **CASE?**

15 A. Yes. On January 1, 2017, Empire began a new chapter in its 107 year history when it
16 was acquired by Liberty Utilities. Liberty Utilities, which is owned by Algonquin
17 Power & Utilities Corp. ("APUC"), serves approximately 800,000 customers in
18 twelve states across the United States through its electric, gas, water and waste water
19 utilities. In addition to its regulated utility business, APUC also operates its Liberty
20 Power business, which owns approximately 1.36 GW of renewable generation in the
21 United States and Canada.

22 **Q. HAVE THERE BEEN CHANGES TO THE WAY IN WHICH EMPIRE**
23 **OPERATES AS A RESULT OF ITS ACQUISITION BY LIBERTY**
24 **UTILITIES?**

1 A. While most of its day-to-day operations remain the same, there have been some
2 changes in the Company's operations. For example, the Company is no longer
3 publicly traded, although APUC is listed on the New York and Toronto Stock
4 Exchanges. Another obvious difference is that Liberty-Empire is now part of a larger
5 corporate family that operates other electric, gas, and water utilities, providing
6 opportunities for collaboration across the business to share best practices and
7 expertise. Being part of a larger corporate family has also brought opportunities for
8 new ideas and approaches. Perhaps the best example of this is Liberty-Empire's
9 Customer Savings Plan, whereby Empire will acquire 600 MW of wind generation,
10 with a tax equity partner contributing half of the capital for the project.

11 **Q. PLEASE DESCRIBE LIBERTY UTILITIES' OPERATING PHILOSOPHY.**

12 A. The cornerstones of Liberty Utilities' values are Quality, Care, and Efficiency. There
13 are many ways that these values translate to the operations of our business. For
14 example, an increased focus on safety is paramount to Liberty Utilities and is
15 embedded in its culture. Liberty Utilities brought this to the Company and has
16 transformed its safety culture significantly. This heightened focus on safety has
17 resulted in a 50% reduction in motor vehicle accidents, a 67% reduction in lost time,
18 and a 50% reduction in OSHA recordable accidents, thereby embodying all three
19 values of Quality, Care, and Efficiency.

20 My testimony describes some of the activities that the Company and its
21 employees have undertaken which demonstrate our commitment to care for the
22 communities in which we serve. Finally, Liberty-Empire witness Tim Wilson's
23 direct testimony describes the Company's commitment to efficiency in how it
24 approaches providing energy to its customers through its plan to retire its Asbury

1 power plant due to the declining economics of its performance in the Southwest
2 Power Pool (“SPP”) and the increasing costs of environmental compliance associated
3 with its long term operation.

4 **Q. SINCE ITS ACQUISITION OF THE COMPANY, HAS LIBERTY UTILITIES**
5 **MADE EFFORTS TO UNDERSTAND AND MEET THE NEEDS OF ITS**
6 **CUSTOMERS?**

7 A. Yes. One significant example of this is Liberty Utilities’ commitment to obtaining
8 feedback from its customers on an ongoing basis in order to better serve them. In
9 2018, Liberty Utilities conducted a community partnership survey to gain an
10 understanding of the strategic plans and future needs of the communities we serve to
11 ensure we are building sustainable partnerships. The survey was sent to thirty
12 communities across the United States.

13 Within Missouri, the community partnership survey included the communities
14 of Webb City, Republic, Branson, and Joplin, to name a few. Liberty-Empire plans to
15 use the results of the survey to develop sustainability proposals with the cities, which
16 could include plans for smart street lighting or electric vehicle charging as examples
17 depending on the needs of each particular community. In addition, Liberty-Empire
18 offers economic development discounts to customers who participate in state and
19 local economic development efforts, which will not only help sustain but hopefully
20 grow our local economy. In 2018, two applications for an Economic Development
21 Rate were submitted - one by Praxair and another by Mid-America Precision
22 Products, both in Joplin. Additionally, as Liberty-Empire witness Jeffrey Westfall
23 describes in his direct testimony, Liberty-Empire continues to focus on improvements

1 to reliability in Missouri, which makes the communities we serve better able to
2 compete for business opportunities.

3 **Q. DOES THE COMPANY PARTICIPATE IN THE COMMUNITIES THAT IT**
4 **SERVES?**

5 A. Absolutely. Our Company and our employees are committed to serving in our local
6 communities. For example, Liberty-Empire's Business and Community Development
7 ("BCD") team actively participates in several organizations and events within the
8 Company's Missouri service territory, including Chamber of Commerce meetings,
9 City Council meetings, and other community events, including in Joplin, Neosho,
10 Aurora, Branson, Ozark, and Bolivar. In addition, Liberty-Empire's BCD team
11 participates in various events including board meetings, meet and greets, and events
12 such as the event held for Governor Parson at the Liberty-Empire facility in Joplin to
13 announce Missouri's Fast Track legislation.

14 The Company also supports, contributes to, and participates in local
15 organizations and events such as Boys and Girls Club of SW MO, Children's Haven
16 of SW MO, Taney County Partnership (economic development), Neosho Schools
17 Foundation, Ronald McDonald house service projects, and city park cleanup in
18 several communities, including Joplin, Mt. Vernon, Marionville, Oronogo, Branson,
19 Sarcoxie, Aurora, and Ozark. These are just examples of the many activities in which
20 we participate in our local communities.

21 **IV. RATE RELIEF REQUESTED IN THIS CASE**

22 **Q. WHAT IS THE COMPANY'S REQUEST FOR BASE-RATE RELIEF IN THIS**
23 **PROCEEDING?**

1 A. The Company is seeking to recover an annual revenue deficiency of approximately
2 \$26.5 million based on a rate base of approximately \$1.5 billion.

3 **Q. WHY IS THE COMPANY REQUESTING A GENERAL RATE INCREASE**
4 **NOW?**

5 A. As stated in the Notice of Intended Case Filing, RSMo. 386.266.4(3) requires
6 Liberty-Empire to “file a general rate case with the effective date of new rates to be
7 no later than four years after the effective date” of the Commission’s order
8 implementing a Fuel Adjustment Clause (“FAC”) for Empire. Empire’s last request
9 for an overall increase in rates for electric service was docketed as Case No. ER-
10 2016-0023, and the Commission’s Report & Order authorizing the continuation of a
11 FAC for Empire was issued in said case on August 10, 2016, effective September 9,
12 2016. Liberty-Empire was thus required to file a general rate case with the effective
13 date of new rates to be no later than four years after September 9, 2016.

14 **Q. PLEASE DESCRIBE THE PRIMARY FACTORS DRIVING THE NEED FOR**
15 **THE RATE INCREASE LIBERTY-EMPIRE IS REQUESTING.**

16 A. There are several reasons why the Company is in need of an increase in its Missouri
17 retail electric rates. First, Liberty-Empire has made significant investments in its
18 transmission and distribution systems to provide service to its customers. Since April
19 1, 2016, through the end of the true-up period, the Company will have invested
20 approximately \$484M in plant investments. Second, as a result of additional capital
21 investment, the Company has increased costs for property taxes and depreciation
22 expense. Third, the Company is not immune to normal and inflationary increases in
23 operating costs. Such investments and expenses need to be reflected in rates if

1 Liberty-Empire is to have a reasonable opportunity to recover its prudently incurred
2 costs and an opportunity to earn a reasonable return on its investments.

3 **Q. PLEASE FURTHER DESCRIBE SOME OF THE DRIVERS FOR THIS**
4 **RATE INCREASE?**

5 A. The Company has made investments through its Operation Toughen-Up initiative, to
6 enhance sectionalization which helps improve reliability. An example of an Operation
7 Toughen-Up project is the investment of approximately \$5.6 million for the
8 installation of breakers in multiple locations within the Missouri territory.
9 Additionally, the Company has invested approximately \$68.8 million in projects that
10 have upgraded multiple substations, increasing the capabilities at which the Company
11 can serve its customers. Also, there were increases to operating expenses, such as
12 Riverton 12's Long Term Service Agreement ("LTSA") costs. A portion of the LTSA
13 is based on the number of operating hours, which have substantially increased as a
14 result of the unit being called on more frequently by the SPP.

15 **Q. IS THE COMPANY PROPOSING A MECHANISM TO HELP STABILIZE**
16 **CUSTOMER BILLS?**

17 A. Yes. The Company is proposing a Weather Normalization Rider so that it can adjust
18 customer bills for variations from normal weather, since its rates are designed based
19 on customer consumption under normal weather conditions. As Liberty-Empire
20 witness Timothy Lyons explains in his direct testimony, the proposed rider will help
21 stabilize customer bills by ensuring that customers pay no more or less than the
22 amount they would have paid under normal weather conditions. In addition, the rider
23 will ensure that the Company receives revenues that are no more or less than the
24 amount it would have received under normal weather conditions.

1 **V. METHODS OF BILL PAYMENT**

2 **Q. HAS THE COMPANY INVESTIGATED CUSTOMER PREFERENCES ON**
3 **BILL PAYMENT METHODS?**

4 A. Yes. The Company utilizes customer surveys to determine the most pressing issues to
5 our customers. Customers have consistently reported that ease of bill payment is a
6 priority, including having no fees for card payments.

7 **Q. DOES THE COMPANY OFFER CUSTOMERS DIFFERENT METHODS TO**
8 **PAY THEIR BILLS?**

9 A. Yes. The Company recognizes that it is not “one size fit all” when it comes to paying
10 one’s utility bill, and as a result, has worked to provide as many bill payment options
11 for customers as reasonably possible. Currently, customers may pay a bill through
12 walking into any one of the Company’s five walk-in centers (expanded by three since
13 the merger), by mailing in payments, at third party locations such as grocery stores,
14 through online banking (ACH), or by paying online using a card. Currently, our
15 Missouri customers are using all of these options, though we have experienced an
16 increased desire on the part of our customers to pay electronically by card. Payments
17 made by card have increased 36% in the last two years from 379,329 in 2016 to
18 511,195 in 2018.

19 **Q. ARE THERE ANY FEES ASSOCIATED WITH MAKING PAYMENTS?**

20 A. Currently, the only method of payment which results in a direct charged fee to
21 customers is through the use of their card. That fee is currently \$2.25 per residential
22 payment and is a fee imposed by the third party that processes the card payments.

23 **Q. SHOULD CUSTOMERS HAVE TO PAY AN ADDITIONAL FEE FOR**
24 **MAKING ONLINE PAYMENTS WITH A CARD?**

1 A. No. Although the Company generally attempts to assign costs to the appropriate cost-
2 causers as part of its cost of service study, online transactions are a normal part of
3 daily life for many Liberty-Empire customers. The fees associated with these
4 transactions are similar to bank fees the Company incurs and which are included in the
5 cost of service paid by all customers. We believe it is not only important from a
6 customer service perspective to provide our customers the choice to pay online, but
7 doing so also reduces the amount of customer service representative hours needed to
8 receive and process in person payments from our customers in our many local offices.
9 For example, reducing the number of interactions for payments will allow more
10 opportunity for the same personnel to solve other issues for our customers.

11 **Q. HOW DOES THE COMPANY PROPOSE TO RECOVER THE COSTS**
12 **ASSOCIATED WITH ONLINE CARD PAYMENTS?**

13 A. The Company proposes recovering these fees the same as other bank fees in its cost of
14 service. Inclusion of these fees represents a very small part, less than a half percent, of
15 the Company's cost to serve its customers and provides the opportunity to meet
16 customers' needs and to potentially improve the percentage of our customers who pay
17 their bills in a timely fashion. Liberty-Empire witness Sheri Richard further describes
18 the fees included in the Company's proposed cost of service in her direct testimony.

19 **VI. MERGER STIPULATION COMPLIANCE**

20 **Q. HAS LIBERTY-EMPIRE COMPLIED WITH THE CONDITIONS SET**
21 **FORTH IN THE AGREEMENT WITH THE CITY OF JOPLIN APPROVED**
22 **BY THE COMMISSION IN CASE NO. EM-2016-0213?**

23 A. Yes. Liberty-Empire agreed to and has met the following conditions with the City of
24 Joplin:

- 1 • The Company has continued to make available employees for appointment on
2 the City of Joplin’s municipal boards and commissions. Employees Jason
3 Grossman continues to serve on the parks board as a vegetation management
4 professional, Rick Stockton works regularly with the street lighting
5 commission, and Adam Greek serves as a board member of the Downtown
6 Joplin Alliance, which partners with the Historic Preservation Board. Also,
7 Liberty-Empire has made available, at least annually, the President of Liberty
8 Utilities Co. for discussions with municipal officials. In addition, the
9 Company has had regular meetings with the Mayor of Joplin and other City
10 officials, as well as presenting to the Joplin City Council.
- 11 • Liberty-Empire has continued its involvement with the Joplin Chamber of
12 Commerce, economic development initiatives, construction projects and other
13 community development projects. I am the Chairman of the Joplin Regional
14 Partnership, the regional economic development organization, and also serve
15 on the board of the Joplin Chamber of Commerce. In both of the
16 organizations, Liberty-Empire plays a key role in the success of the efforts
17 made to bring in new business into the area.
- 18 • The Company has also maintained its Central Region headquarters office at
19 602 South Joplin Avenue, which includes at least 85% of the administrative
20 supervisory, management and executive positions in Liberty Utilities’ Central
21 Region. The Company has used good faith efforts to consider and evaluate
22 Joplin as the location for any and all new positions, including moving some
23 employees from Jackson, Missouri to its Joplin headquarters.

1 • The Company’s sales tax collections and franchise tax collections continue to
2 be sourced at the Central Region headquarters in Joplin, Missouri, and all
3 payments for the TIF District shall be maintained in accordance with current
4 obligations.

5 **Q. DID LIBERTY-EMPIRE AGREE TO OTHER CONDITIONS WITH THE**
6 **CITY OF JOPLIN?**

7 A. Yes. Company witness Mr. Dale Harrington addresses Liberty-Empire’s compliance
8 with the additional conditions agreed to with the City of Joplin in Case No. EM-2016-
9 0213.

10 **Q. HAS LIBERTY-EMPIRE COMPLIED WITH THE CUSTOMER SERVICE**
11 **CONDITIONS FROM THE MERGER DOCKET?**

12 A. Yes. There is one area, however, where the Company did not reach its goals.
13 Condition F1 in the Staff Stipulation approved in the merger docket provides that
14 “Empire and Liberty will strive to meet or exceed the customer service and
15 operational levels currently provided to their customers.” Unfortunately, certain
16 customer service call answering metrics were not met in 2017 and 2018. In 2017, the
17 Company missed the target by 2%, and in 2018, the Company was 16% below
18 targeted levels of performance. Several factors led to the lower performance,
19 including an almost 60% turnover of the Contact Center employee base, in large part
20 due to retirements, which in turn provided opportunities for promotions of customer
21 service employees into other departments. While this is a great opportunity for
22 employees, it is not uncommon for new representatives to have an effective
23 performance that is 50% of that of an experienced representative. During this time,
24 the Company alerted Commission Staff of the performance issue and the reason

1 behind it. The Company has increased its staffing beyond pre-merger levels in the
2 Contact Center. To date in 2019, the Company is 6% below target and improving
3 each quarter. As described above, the Company has periodically met with Staff
4 Consumer and Management Analysis personnel to review contact center and other
5 service quality performance, and within the first 24 months following the acquisition,
6 notified Staff of any material operational changes concerning customer contact
7 centers or other customer service functions.

8 **Q. ARE THERE OTHER PROVISIONS FROM THE MERGER DOCKET THAT**
9 **YOU WOULD LIKE TO ADDRESS?**

10 A. Yes. The Company complied with the following requirements:

- 11 • Provide Staff and the Office of the Public Counsel an organizational chart
12 illustrating the positions and names of employees that have customer service
13 responsibilities within thirty (30) days after the closing Transaction;
- 14 • Other than to provide necessary services to and in support of regulated
15 operations, Liberty-Empire has not made available, sold or transferred
16 customer information to affiliated or unaffiliated entities without prior
17 informed consent of the Missouri customer.
- 18 • In evaluating billing systems for future use, Liberty-Empire has and will
19 continue to consider the ability of any billing system to maintain or improve
20 cumulative frequency distribution of bills ending in each block in each billing
21 cycle and the quality of existing load research and metering data.

1 • Liberty-Empire agrees that Liberty-Empire’s load research sample will take
2 into account both the summer and winter usage of the customers in each
3 customer class.

4 **Q. DOES LIBERTY-EMPIRE PLAN TO IMPLEMENT OTHER CUSTOMER**
5 **SYSTEMS OR PROJECTS TO IMPROVE CUSTOMER CARE FUNCTIONS?**

6 A. Yes. Liberty-Empire intends to improve customer care functions and related
7 operational performance through the implementation of an Advanced Metering
8 Infrastructure (“AMI”) system. Broadly considered, Liberty-Empire’s AMI initiative
9 falls within Liberty Utilities’ overarching *Customer First* corporate initiative.
10 *Customer First* is a multi-year initiative with many components, stages, and
11 milestones. As part of *Customer First*, Liberty Utilities is evaluating the consolidation
12 of several systems, including its Customer Information System (“CIS”), which
13 includes Liberty-Empire’s customer billing system functions.

14 **Q. HAS LIBERTY-EMPIRE MAINTAINED THE AGREED TO ANNUAL**
15 **LEVEL OF CHARITABLE CONTRIBUTIONS AND TRADITIONAL LOCAL**
16 **COMMUNITY SUPPORT?**

17 A. Yes. The Company has continued to contribute to charitable entities and local
18 community programs.

19 **Q. HAS LIBERTY-EMPIRE FUNDED AN ACCOUNT IN THE AMOUNT OF**
20 **\$1,500,000 TO BE AVAILABLE TO THE COMMUNITY ACTION**
21 **AGENCIES?**

22 A. Yes.

23 **Q. DID LIBERTY-EMPIRE INVESTIGATE AND PRESENT ITS FINDINGS**
24 **REGARDING THE FEASIBILITY OF A BILL PAYMENT EXTENSION FOR**

1 **RESIDENTIAL AND SMALL COMMERCIAL ACCOUNTS TO BE**
2 **PROLONGED FROM TWENTY-ONE DAYS TO THIRTY-ONE DAYS**
3 **BEFORE APPLICABLE PENALTY BEGINS?**

4 A. Yes. On June 30, 2017, Liberty-Empire presented its findings to Staff and the Office
5 of Public Counsel.

6 **Q. DID LIBERTY-EMPIRE MATCH BAD DEBT AND ARREARAGE**
7 **RELATED TO CUSTOMERS WHO RECEIVED BENEFITS THROUGH A**
8 **LOW INCOME PROGRAM?**

9 A. Yes. For customer accounts that remained current for at least a period of twelve
10 months after reconnection, the Company matched dollar for dollar the bad debt and
11 arrears related to customers who received benefits through a low income program.

12 **Q. DOES LIBERTY-EMPIRE’S HOMEPAGE INCLUDE A LINK FOR**
13 **“TROUBLE PAYING YOUR BILL”?**

14 A. Yes. Customers can click on the link to access information regarding the Company’s
15 delinquency policy, including fees, timelines, cut-off practices, Community Action
16 Agency and other 3rd party contacts, LIHEAP, LIWAP, and additional Company
17 specific programs, as well as additional information for customers at risk of not being
18 able to pay their bills.

19 **Q. HAS LIBERTY-EMPIRE HELD ANNUAL MEETINGS WITH EACH OF**
20 **THE LOCAL COMMUNITY ACTION AGENCIES TO DISCUSS PROGRESS**
21 **TO DATE, STRENGTHS, WEAKNESSES, OPPORTUNITIES AND**
22 **THREATS TO LIBERTY-EMPIRE’S LOW-INCOME POPULATION?**

1 A. Yes. Liberty-Empire has met with representatives of ESC, OACAC, MVCAA,
2 WCMCAA, the Commission Staff, the Office of Public Counsel, the Division of
3 Energy, and Renew Missouri to discuss how to best serve its low income population.

4 **Q. DID THE COMPANY AGREE TO ANY OTHER STIPULATIONS DURING**
5 **THE MERGER ACQUISITION?**

6 A. Yes. Company witnesses Sheri Richard, Nathaniel Hackney, Jeffrey Westfall, Dale
7 Harrington, Jill Schwartz, Bob Hevert, and Timothy Lyons address compliance with
8 other merger stipulations in their testimony.

9 **VII. WITNESSES IN THIS CASE**

10 **Q. PLEASE IDENTIFY THE WITNESSES WHO WILL BE SPONSORING**
11 **TESTIMONY IN THIS PROCEEDING.**

12 A. The following witnesses are submitting testimony in this proceeding:

Witness	Subject Matter Area
Brent Baker	Company Background, Customer Experience, Bill Payment, Merger Stipulations, Company Witnesses
Sheri Richard	Revenue Requirement, Merger Stipulations, MFRs, and Recovery Mechanisms
Timothy N. Wilson	Generation Plant in Service, Asbury Retirement
Aaron J. Doll	Fuel Adjustment Clause, Natural Gas Hedging
Todd W. Tarter	Fuel Adjustment Base Factor and Fuel and Purchased Power Costs
Jeffrey Westfall	Transmission and Distribution Investments, System Reliability
Samuel S. McGarrah	Lighting Tariffs
Dale Harrington	Merger Stipulation Human Resource Requirements
Jill Schwartz	Corporate Cost Allocations

Leigha Palumbo	Rate Base and Income Statement Pro Forma Adjustments
Nathanial W. Hackney	Energy Efficiency Programs, MO Solar Initiatives, Merger Stipulations, Low Income Pilot Program
James A. Fallert	Pension and OPEB Costs and Trackers
Eric Fox	Weather Normalization
Robert B. Hevert	Return on Equity
Timothy S. Lyons	Cost of Service Study, Rate Design, Lead-Lag Study, Weather Normalization Rider, Bill Impact Analyses, Inclining Block Rates, MO Jurisdiction Cash Working Capital Requirement

- 1 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**
- 2 A. Yes.

