

FILED

JUL 9 1997

MISSOURI
PUBLIC SERVICE COMMISSION

VERIFIED STATEMENT

OF

MARK L. OLIGSCHLAEGER

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-97-81

Q. Please state your name and business address.

A. Mark L. Oligschlaeger, P. O. Box 360, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am a Regulatory Auditor with the Missouri Public Service Commission
(Commission).

Q. Please describe your educational background and work experience.

A. I attended Rockhurst College in Kansas City, MO, and received a Bachelor
of Science degree in Business Administration with a major in Accounting in August 1981.
I have been employed by the Commission since September 1981 within the Accounting
Department. In November 1981, I passed the Uniform Certified Public Accountant (CPA)
examination and, since February 1989, I have been licensed in the state of Missouri as a
CPA.

Q. Have you previously filed testimony before this Commission?

A. Yes. A listing of cases in which I have previously filed testimony before this
Commission is given in Schedule 1, attached to this verified statement.

Q. What is the purpose of this verified statement?

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1 A. This statement will present the Staff's position as to the in-service status of
2 Empire District Electric Company's (Empire or Company) Stateline Combustion Turbine
3 No. 2 (SLCT2) as of midnight, June 21, 1997, and the significance of that finding to the rate
4 increase to be granted to Empire by the Commission as a result of this proceeding.

5 Q. Has the Staff previously proposed a set of "in-service criteria" to be used to
6 determine whether SLCT2 is in-service as of a date certain and should be reflected in rates
7 resulting from this proceeding?

8 A. Yes. Nine separate in-service criteria for SLCT2 were set forth in the direct
9 testimony of Staff witness C. Bruce Deering of the Energy Department filed in this
10 proceeding.

11 Q. Have these criteria been modified at all during the course of this proceeding?

12 A. No. In fact, the Staff's criteria were adopted verbatim by the parties to this
13 rate case in both the Unanimous Stipulation and Agreement filed April 4, 1997 (which
14 required the in-service criteria to be applied to SLCT2 as of May 31, 1997), and the First
15 Amendment to the Unanimous Stipulation and Agreement (First Amendment) filed
16 June 23, 1997 (which, among other items, extended the in-service deadline for SLCT2 from
17 May 31 to June 21, 1997)

18 Q. What is the relationship of the in-service criteria to the revenue requirement
19 amounts agreed upon in the First Amendment?

20 A. The First Amendment details the agreement/acquiescence of all the parties to
21 the case to granting Empire a revenue requirement of \$10,589,364 if SLCT2 does not meet

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1 the stipulated in-service criteria as of June 21, 1997, and a \$13,941,377 increase if SLCT2
2 does meet those criteria.

3 Q. Did SLCT2 meet the stipulated in-service criteria as of June 21, 1997, as
4 specified in the First Amendment?

5 A. No. As detailed in the verified statement of Staff witness Deering filed on
6 June 30, 1997, as of midnight, June 21, 1997, SLCT2 failed to meet three out of the nine
7 agreed upon criteria.

8 Q. Given the findings contained in Mr. Deering's verified statement, what is the
9 Staff's position regarding the in-service status of SLCT2 for purposes of this rate case?

10 A. It is the Staff's position that Empire clearly failed to meet the stipulated
11 in-service criteria unanimously agreed to by the parties to this case by the required date of
12 June 21, 1997.

13 Q. What is the Staff's recommendation to the Commission on this matter?

14 A. The Staff recommends that the Commission accept, in its entirety, the
15 Unanimous Stipulation and Agreement (as modified by the First Amendment) filed in this
16 case. Under the terms of the First Amendment, SLCT2 did not comply with the stipulated
17 criteria and is not considered to be in-service for purposes of setting rates in this case.
18 Accordingly, Empire should be granted a \$10,589,364 rate increase by the Commission.

19 Q. Does that conclude your verified statement?

20 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the matter of The Empire District Electric)
Company of Joplin, Missouri, for Authority to) ER-97-81
File Tariffs Increasing Rates for Electric Service)
Provided to Customers in the Missouri Service)
Area of the Company.)

AFFIDAVIT OF MARK L. OLIGSCHLAEGER

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

Mark L. Oligschlaeger, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Verified Statement in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Verified Statement 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.

Mark L. Oligschlaeger
Mark L. Oligschlaeger

Subscribed and sworn to before me this 9th day of July 1997.

Roberta A. McKiddy
Notary Public

My Commission Expires: _____
ROBERTA A. McKIDDY
Notary Public, State of Missouri
County of Cole
My Commission Expires 09/11/99

MARK L. OLIGSCHLAEGER

<u>COMPANY</u>	<u>CASE NO.</u>
Kansas City Power and Light Company	ER-82-66
Kansas City Power and Light Company	HR-82-67
Southwestern Bell Telephone Company	TR-82-199
Missouri Public Service Company	ER-83-40
Kansas City Power and Light Company	ER-83-49
Southwestern Bell Telephone Company	TR-83-253
Kansas City Power and Light Company	EO-84-4
Kansas City Power and Light Company	ER-85-128 & EO-85-185
KPL Gas Service Company	GR-86-76
Kansas City Power and Light Company	HO-86-139
Southwestern Bell Telephone Company	TC-89-14
Western Resources	GR-90-40 & GR-91-149
Missouri-American Water Company	WR-91-211
UtiliCorp United, Inc. / Missouri Public Service	EO-91-358 & EO-91-360
Generic: Expanded Calling Scopes	TO-92-306
Generic: Energy Policy Act of 1992	EO-93-218
Western Resources/Southern Union Company	GM-94-40
St. Louis County Water Company	WR-95-145
Union Electric Company	EM-96-149

St. Louis County Water Company

WR-96-263

Missouri Gas Energy

GR-96-285

Empire District Electric Company

ER-97-82

Service List
Case No. ER-97-81
Revised: July 9, 1997

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