

EXHIBIT

OPC Exhibit No. 320
Date 9/24/18 Reporter SA
File No. ER-2018-0145+0146

Exhibit No.:
Issue(s):

Policy/
Productivity/
Affiliate Transactions
Schallenberg/Direct
Public Counsel
ER-2018-0145
and ER-2018-0146

Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

DIRECT TESTIMONY

OF

ROBERT E. SCHALLENBERG

FILED
October 23, 2018
Data Center
Missouri Public
Service Commission

Submitted on Behalf of
the Office of the Public Counsel

**KANSAS CITY POWER & LIGHT COMPANY
and
KCP&L GREATER MISSOURI OPERATIONS COMPANY**

Case No. ER-2018-0145 and ER-2018-0146

June 19, 2018

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service)
Case No. ER-2018-0145)
Tracking Nos. YE-2018-0095 & YE-2018-0096)

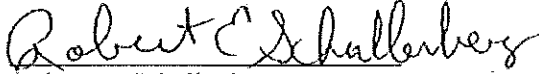
In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service)
Case No. ER-2018-0146)
Tracking No. YE-2018-0097)

AFFIDAVIT OF ROBERT E. SCHALLENBERG

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Robert E. Schallenberg, of lawful age and being first duly sworn, deposes and states:

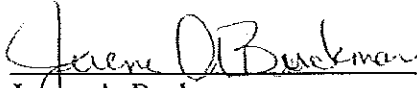
1. My name is Robert E. Schallenberg. I am a Director of Policy for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Robert E. Schallenberg
Director of Policy

Subscribed and sworn to me this 19th day of June 2018.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2021
Coke County
Commission #13754037


Jerene A. Buckman
Notary Public

My Commission expires August 23, 2021.

1 **DIRECT TESTIMONY**

2 **OF**

3 **ROBERT E. SCHALLENBERG**

4 **Kansas City Power & Light Company (KCPL)**

5 **CASE NO. ER-2018-0145**

6 **KCP&L Greater Missouri Operations Company (GMO)**

7 **CASE NO. ER-2018-0146**

8 **Q. Please state your name and business address.**

9 A. My name is Robert E. Schallenberg. My business address is Post Office Box 2230,
10 Jefferson City, Missouri, 65102.

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

12 A. I am the Director of Policy at the Office of the Public Counsel ("OPC").

13 **Q. Please describe your educational background, professional credentials, and work
14 experience.**

15 A. I am a 1976 graduate of the University of Missouri at Kansas City with a Bachelor of
16 Science degree and major emphasis in Accounting. In November 1976, I successfully
17 completed the Uniform Certified Public Accountant ("CPA") examination and
18 subsequently received the CPA certificate. In 1989, I received my CPA license in
19 Missouri. I began my employment with the MoPSC as a Public Utility Accountant in
20 November 1976. I remained on the Staff of the MoPSC until May 1978, when I
21 accepted the position of Senior Regulatory Auditor with the Kansas State Corporation
22 Commission (KCC). In October 1978, I returned to the Staff of the MoPSC. I held

1 auditor and management positions with the Staff of the MoPSC through May, 2018
2 when I accepted my current position with OPC.

3 **Q. What specific work experiences assisted you most in the preparation of this**
4 **testimony?**

5 **A.** My auditing experience with the MoPSC as an Audit Supervisor/Regulatory Auditor V
6 and my management experience with the MoPSC's auditing, management service, and
7 legal groups. During my career as an auditor, I was involved in a direct role in
8 processing the cases listed in my Schedule RES-d1. In October 1997, I was named
9 Division Director of the Utility Services Division of the MoPSC placing me in a
10 management role with the auditing and management services groups. In November
11 2011, my group became the Auditing, Accounting and Financial Analysis Department.
12 During my term in senior management, I was involved in the strategic aspects of cases
13 listed in Schedule RES-d1 during this period as well as performing management
14 activities. My work activities as a Regulatory Auditor V is the primary background that
15 I rely upon to create this testimony.

16 **Q. Please describe your responsibilities and experience while employed at the MoPSC**
17 **as a Regulatory Auditor V?**

18 **A.** As a Regulatory Auditor V for the MoPSC, I had several areas of responsibility. I was
19 required to have and maintain a high degree of technical and substantive knowledge in
20 utility regulation and regulatory auditing. Among my various responsibilities as a
21 Regulatory Auditor V were:

- 22 1. To conduct the timely and efficient examination of the accounts,
23 books, records and reports of jurisdictional utilities;

1 2. To aid in the planning of audits and investigations, including
2 staffing decisions, and in the development of Staff positions in cases to
3 which the Accounting Department of the MoPSC was assigned, in
4 cooperation with Staff management as well as other Staff;

5 3. To serve as lead auditor, as assigned on a case-by-case basis, and to
6 report to the Assistant Manager-Accounting at the conclusion of the case on
7 the performance of less experienced auditors assigned to the case, for use in
8 completion of annual written performance evaluations;

9 4. To assist in the technical training of other auditors in the
10 Accounting Department;

11 5. To prepare and present testimony in proceedings before the MoPSC,
12 the Federal Communications Commission ("FCC") and the Federal Energy
13 Regulatory Commission ("FERC"), and aid MoPSC Staff attorneys and the
14 MoPSC's Washington, D.C. counsel in the preparation of pleadings and for
15 hearings and arguments, as requested; and

16 6. To review and aid in the development of audit findings and prepared
17 testimony to be filed by other auditors in the Accounting Department.

18 The MoPSC has relied on the Regulatory Auditor V position to be able to present and
19 defend positions both in filed testimony and orally at hearing. I have had many
20 occasions to present testimony before the MoPSC on issues ranging from the prudence
21 of building power plants to the appropriate method of calculating income taxes for
22 ratemaking purposes. I have worked in the area of telephone, electric and gas utilities.
23 I have taken depositions on behalf of the MoPSC in FERC dockets. Attached as
24 Schedule RES-d1, is a listing of cases and issues on which I have worked at the MoPSC.
25 My responsibilities were expanded to assist in federal cases involving the MoPSC as
26 assigned.

1 **Q. Have you previously submitted testimony in proceedings before the FERC?**

2 A. Yes. I submitted testimony in Docket Nos. RP94-365-000, RP95-136-000, RP96-173-
3 000, et al. These dockets were cases involving Williams Natural Gas Company
4 (“WNG”). WNG provides gas transportation and storage services for local distribution
5 companies serving the western portion of Missouri. WNG provides service to Missouri
6 Gas Energy which serves the Kansas City area. My testimony in Docket No. RP94-
7 365-000 involved a prudence challenge of the costs that WNG sought to recover in that
8 case. I also filed testimony regarding certain cost of service issues in Docket No. RP95-
9 136-000, WNG’s rate case before the FERC. These issues included affiliated
10 transactions between WNG and its parent. I also conducted depositions on this
11 Commission’s behalf regarding affiliated transactions between WNG and its parent
12 company. I filed testimony in Docket No. RP96-173-000, et al., on the issue of whether
13 the costs in question met FERC’s eligibility criteria for recovery under FERC Order No.
14 636.

15 I submitted testimony in Docket No. RP96-199-000. That case was a Mississippi River
16 Transmission Corporation (“MRT”) rate case. MRT provides gas transportation and
17 storage services for local gas distribution companies serving the eastern portion of
18 Missouri. MRT provides service to Laclede Gas Company (“Laclede”) which serves
19 the St. Louis area. My testimony in Docket No. RP96-199-000 involved cost of service
20 issues. These issues included affiliated transactions between MRT and its parent
21 company.

22 **Q. What expertise do you have relative to Missouri’s affiliate transactions rules as**
23 **applied to electric and gas utilities, 4 CSR 240-20.105 and 4 CSR 240-40.105?**

1 A. I helped draft the Missouri affiliate transactions rules which were to apply to not just to
2 the telecommunications industry. The rules were developed based on a Commission
3 initiative. The Commission wanted greater administrative efficiency as affiliate
4 transactions were playing a greater role in Southwestern Bell Telephone Company
5 ("SWBT") rate cases. The number of affiliate transaction issues was increasing in
6 SWBT rate cases and lack of documentation of key information (e.g., time reporting of
7 executive and non-executive personnel, determination and charging of costs,
8 determination of and charging of market value, etc.) made the affiliate issues more
9 difficult to address and resolve. The Commission's affiliate transactions rules were
10 influenced by the affiliate transactions rules applied by the FCC.

11 Through the National Association of Regulatory Utility Commissioners ("NARUC")
12 I have experience in examination of the telephone implementation of safeguards against
13 affiliate transaction abuse and participated on joint audits with other states and the FCC
14 before the Bell System divestiture and telephones/telecommunications were deregulated
15 in Missouri. I was familiar with the SWBT implementation of its affiliate transactions
16 protections as well as those of General Telephone Company.

17 **Q. Was it thought that affiliate transactions rules were needed only for the**
18 **telephone/telecommunications industry?**

19 A. No. Among other things, there was divestiture of the Bell System and there was
20 deregulation of the state telephone/telecommunications industry in Missouri so the
21 affiliate transactions rule that was viewed as needed for the
22 telephone/telecommunications industry was ultimately developed for the electric, gas
23 and steam heat regulated industries that are covered by Chapter 393.

1 **Q. Somehow did utilities react to the Commission's adoption of affiliate transactions**
2 **rules?**

3 A. Initially, some Missouri utilities would not implement the rules the Commission
4 adopted. Certain companies ultimately appealed the affiliate transactions rules to the
5 Missouri Supreme Court. The Supreme Court decision identifies Atmos Energy
6 Corporation ("Atmos"); Missouri Gas Energy ("MGE"); Laclede Gas Company
7 ("Laclede"); Trigen-Kansas City Energy Corporation ("Trigen"); Ameren Corporation
8 ("Ameren"); and Union Electric Company ("UE"), d/b/a AmerenUE as the companies
9 appealing the Commission's adoption of affiliate transactions rules.

10 **Q. Have you worked on the KCPL/GMO Cost Allocation Manual (CAM) case?**

11 A. Yes. I worked on that manual in the context of File No. EO-2014-0189, In the Matter
12 of Kansas City Power & Light Company ("KCPL") and KCP&L Greater Missouri
13 Operations Company's ("GMO") Application for Approval of Cost Allocation Manual
14 Application for Approval of Cost Allocation Manual.

15 **Q. What is the purpose of your direct testimony in this case?**

16 A. The purpose of my testimony is to address some of the issues that OPC has identified
17 as areas of interest at this time and discuss why these areas are of interest and need to
18 be addressed. I identify the OPC witnesses addressing other areas of concern in these
19 cases.

20 Lena Mantle is addressing OPC's concern that KCPL/GMO have
21 decreasing revenues, but claim that at the same time they have increasing
22 fuel and purchase power costs. To address this concern Ms. Mantle will
23 examine to determine whether Missouri customers are paying for KCPL's

1 obligations in Kansas to serve its Kansas customers. The overall cost of
2 service adjustments appear to be several tens of millions of dollars of
3 additional costs in the future. Ms. Mantle will also examine KCPL's and
4 GMO's historical fuel adjustment clauses (FAC) charges with the objective
5 of determining whether they appear consistent with historically fuel and
6 purchase power price trends.

7 Mr. John Riley is determining OPC's position regarding the impact of
8 the 2017 Tax Cuts and Jobs Act on KCPL and GMO customer rates and is
9 also addressing the proper approach for reflecting the various impacts of the
10 associated expense reductions in customer rates. Mr. Riley also addresses
11 OPC's concern that the definition of fuel, purchase power, and off-system
12 sales costs in KCPL's and GMO's FAC need to be refined to reduce the
13 possibility that expenses which should not flow through their FACs,
14 expenses such as cell phone expenses and other non-fuel, and off-system
15 sales-related purchased power costs do not flow through their FACs.

16 Mr. John Robinett is addressing OPC's concerns regarding GMO's early
17 retirement of the Sibley unit 3 and GMO's increasing need to rely on
18 purchased power to serve its customers' load, which is exacerbated by
19 retiring the unit. Mr. Robinett is also addressing OPC's position regarding
20 the \$7.2 million amortization related to depreciation expense established
21 in settlement of GMO's last general electric rate case. Mr. Robinett is
22 developing in conjunction with Ms. Amanda Conner OPC's position
23 regarding the costs related to the new customer information system (ONE

1 CIS). Mr. Robinett is also addressing OPC's position regarding power
2 plants expenses that KCPL and GMO are retiring at the time the rates in
3 this case will go into effect.

4 Ms. Conner is addressing OPC's concern with the continuing problems
5 with the level of management expenses, and testifying about OPC's
6 investigation of specific affiliate transactions.

7 Ms. Keri Roth is addressing OPC's concern regarding costs for
8 activities that KCPL and GMO do not need to engage in to provide safe and
9 adequate service or that are uneconomic.

10 Mr. Geoff Marke is addressing OPC's concerns regarding safeguards
11 and protections of customer information, including in the area of automatic
12 meter information (AMI).

13 **Q. Does OPC have all the information it needs to make a final recommendations on**
14 **the areas it has identified as concerns in these cases?**

15 **A.** No. These cases will ultimately be based on information and data that is currently
16 unavailable at this time. These cases will be updated through December 31, 2017, and
17 trued-up through June 30, 2018. An added difficulty to processing these rate cases is
18 that no item(s) has/have been identified as being significant for increasing KCPL's and
19 GMO's costs beyond the test year ending June 30, 2017. The major known cost change
20 of which OPC is aware is a cost reduction due to a federal income tax law change that
21 took effect January 1, 2018. This new cost information is being introduced in the future
22 with less time to examine the material than will be spent on examining the data it will
23 be replacing. History seems to indicate that a majority of the data that supports a cost

1 increase is in update/true-up material that are recognized through use of forecasted
2 information or an allowance in direct filings.

3 The items that I specifically address are KCPL's productivity/cost efficiency and
4 KCPL's and GMO's affiliate transactions, including their Grid Assurance variance
5 request. Grid Assurance is being addressed in this testimony as it is unknown to OPC
6 what the impact of Grid Assurance will be in the future update/true-up material, as
7 KCPL and GMO have cited transmission expense as a factor driving KCPL and GMO
8 to seek rate increases. KCPL and GMO each assert that their costs have increased to a
9 level that exceed the cost reductions from the federal income tax law changes.

10 **Q. How has OPC organized its concerns regarding these rate cases?**

11 A. OPC has identified three scenarios that must be examined to appropriately resolve
12 KCPL's and GMO's requests to increase their electric rates to Missouri customers.
13 OPC's ultimate position in these cases will be premised on the scenario that it finds
14 applies and that, hopefully, the Commission adopts. The first scenario is that these costs
15 increases or revenue losses are beyond KCPL's and GMO's control and despite KCPL's
16 and GMO's reasonable efforts to control the adverse factors causing these cost increases
17 or revenue losses, combined with KCPL's and GMO's reasonable efforts to reduce costs
18 or raise more net revenue in other utility activities; the costs increases and revenue losses
19 have exceeded the reduction in federal income taxes. If the Commission finds this
20 scenario is true, then the Commission should approve KCPL's and GMO's request to
21 raise their rates.

22 **Q. What is the second scenario?**

1 A. The second scenario is that KCPL and GMO have utilized specious cost or revenue
2 positions in their overall cost of service studies to satisfy a predetermined objective that
3 KCPL's and GMO's current rates should be increased, or at least continued, while
4 addressing the federal income tax reduction impacts. If OPC finds evidence that KCPL
5 and GMO have used this scenario in these rate cases, OPC will propose a reduction in
6 the recovery of KCPL's and GMO's rate case expense, and will contest all the specious
7 positions proposed by KCPL and GMO in their rate cases. If the Commission finds this
8 scenario to be true, then a rate reduction will likely result. OPC is evaluating whether
9 all processes needed to order and implement a rate reduction are in place in these cases.

10 **Q. What is the third scenario?**

11 A. KCPL and GMO have legitimate cost increases and revenue losses beyond their control
12 but they have failed to take reasonable efforts to increase productivity and implement
13 expense reductions, or to increase their net revenues to offset the legitimate cost
14 increases and revenue losses. This scenario could result in either rate increases or rate
15 reductions.

16 **Q. What are the areas that OPC will examine to determine which scenario it will**
17 **advocate to the Commission actually applies these requested rate increases?**

18 A. While new areas may appear as OPC receives responses to data requests and obtains
19 new information and reviews it, OPC has identified five (5) additional areas to examine
20 to determine which of the three scenarios actually apply to these cases. These additional
21 areas are: 1) jurisdictional allocations, 2) Evergy merger, 3) capital structure and return
22 on equity, 4) affiliate transactions including Grid Assurance, and 5) evidence of a formal
23 productivity or efficiency program(s).

1 **Q. What is the OPC position regarding jurisdictional allocations?**

2 A. It is OPC's position that the traditional methodology for jurisdictional allocations should
3 continue until such a time as it is shown to be improper. It would be an indication that
4 this case is a scenario 2 case if KCPL is using a different jurisdictional allocation
5 approach than the approach customarily used in setting KCPL's rates in the past without
6 new relevant data that would support a change to past practice.

7 **Q. What is the OPC position regarding Evergy merger?**

8 A. KCPL and GMO customers should not be not be paying any costs related to the Evergy
9 merger. This area is also related to the affiliate transaction area where the purpose of
10 the Commission's affiliate rules is to provide Missouri ratepayers the assurance that
11 their rates are not adversely impacted by affiliate transactions. OPC is developing a
12 worksheet that identifies the affiliate transaction issues to date, which OPC will address
13 as these cases proceed.

14 **Q. What is the OPC position regarding KCPL's and GMO's capital structures and
15 return on equity?**

16 A. At this time the consolidated capital structure of KCPL and GMO's parent Great Plains
17 Energy is not prudent and reflects the impacts of Great Plains Energy's failed efforts to
18 acquire Westar, and Great Plains Energy's 2017 net loss. Thus a hypothetical capital
19 structure is needed. Since KCPL controls the capital structure for itself and all its other
20 affiliates, a conflict of interest exists for KCPL. OPC will examine alternative capital
21 structures and related cost of capital to develop its position on capital structure and cost
22 of equity.

23 **Q. What is OPC's position regarding affiliate transactions?**

1 A. It is OPC's position that KCPL's and GMO's affiliate transactions need to be verified
2 that they are compliant with the Commission's affiliate transaction rule, granted
3 variances, and KCPL and GMO's Commission-approved Cost Allocation Manual
4 (CAM). KCPL's scope of operations is greater than those of an electric utility. KCPL
5 operates as a service company for Great Plains Energy (GPE), its holding company, and
6 operates all other GPE entities including GMO. KCPL also operates the Great Plains
7 Energy Service Company, which is an entity that files a Form 60 at the Federal Energy
8 Regulatory Commission as a service company.

9 **Q. What does KCPL service company function have to do with these rate cases?**

10 A. KCPL determines several of the key costs factors that are used to set both its and GMO's
11 rates. KCPL controls GMO's cost of service. KCPL also controls its own cost of service,
12 as KCPL's costs are the costs that KCPL incurs, but does not charge to its affiliates.
13 KCPL does not identify its service company function as a cost center distinctly separate
14 from KCPL's electric utility function. With this approach, all charges are under KCPL's
15 control. The end result is that the costs that KCPL does not charge to GMO and other
16 affiliates are considered to be KCPL costs.

17 **Q. Does OPC have an opinion regarding whether KCPL operates itself and all its**
18 **affiliates consistent with the Commission's affiliate transaction rules, commission-**
19 **approved variances, and commission-approved KCPL and GMO CAM?**

20 A. Yes. OPC has discovered discrepancies that could be compliance issues as well as rate
21 case issues, such as the treatment of the financial impact of KCPL and GMO
22 Receivables' activities. OPC has noted that KCPL and GMO's cost of service study has

1 included adjustments to increase the two utilities' costs of service to reflect costs related
2 to their receivable affiliates' activities.

3 **Q. Are there other affiliate transactions matters you will be addressing in this**
4 **testimony?**

5 A. There is another pending case at the commission, Case No. EE-2018-0108, related to an
6 affiliate transaction rule variance request to allow KCPL and GMO to participate in a
7 transaction with an affiliate, Grid Assurance. It is uncertain what the full impact of this
8 case will be in these rate cases. The rate case impact is greater than the financial scope
9 of the Grid Assurance spare parts agreement. The rate case can be also impacted by
10 KCPL costs to support Grid Assurance that OPC has not at this time been able to verify
11 have been properly treated.

12 **Q. At this time what is OPC's position regarding the Grid Assurance variance**
13 **request?**

14 A. OPC opposes the Grid Assurance variance request at time, as there has not been
15 adequate information provided to show and verify that good cause exists to approve
16 non-compliance with the Commission's applicable affiliate transaction rule. In addition,
17 there is no information that shows that granting the variances would be consistent with
18 the affiliate transaction rule's purpose that KCPL's and GMO's customers have the
19 assurance that their rates will not be adversely impacted by KCPL's and GMO's affiliate
20 transactions with Grid Assurance.

21 **Q. Why is OPC concerned about KCPL's and GMO's productivity and cost**
22 **efficiency?**

1 A. This concern was created when KCPL and GMO filed rate cases seeking rate increases
2 when, due to the substantial reduction of the federal corporate income tax rate, OPC
3 expected KCPL's and GMO's rates should be reduced to flow through their income tax
4 expense reductions. KCPL and GMO represent that their rate cases are intended to
5 reflect in their customers' rates the full impact of recent income tax reductions that
6 became effective January 1, 2018, in their requests for the Commission to approve
7 overall increases in their rates. KCPL and GMO are representing that their customer
8 rates must increase to reflect the full effect of the cost reductions of federal income
9 taxes. The KCPL and GMO rate cases imply that KCPL and GMO have cost increases
10 or revenue losses that more than offset their cost reductions from the federal corporate
11 income tax reductions.

12 **Q. Does this conclude your Direct testimony?**

13 A. Yes.

CASE PROCEEDING PARTICIPATION

ROBERT E. SCHALLENBERG

<u>COMPANY</u>	<u>CASE NO.</u>
Grain Belt Express Clean Line, LLC	EA-2016-0358
Spire, Inc. EnergySouth, Inc.	GM-2016-0342
Great Plains Energy, Inc. Westar Energy, Inc.	EM-2016-0324
Kansas City Power & Light Company	ER-2016-0285
The Empire District Electric Company, Liberty Utilities (Central) Co. and Liberty Sub Corp.	EM-2016-0213
Laclede Gas Company	GF-2015-0181
The Empire District Electric Company	AO-2012-0062
KCP&L Greater Missouri Operations Company	ER-2010-0356
Kansas City Power & Light Company	ER-2010-0355
Great Plains Energy Incorporated, Kansas City Power & Light Company	ER-2009-0090
Great Plains Energy Incorporated, Kansas City Power & Light Company	ER-2009-0089
Great Plains Energy Incorporated, Kansas City Power & Light Company, Aquila, Inc.	EM-2007-0374
Union Electric Company, d/b/a AmerenUE	ER-2007-0002
Missouri Pipeline Company	GC-2006-0491
Aquila, Inc.	ER-2005-0436
Union Electric Company, d/b/a AmerenUE	EA-2005-0180
Union Electric Company, d/b/a AmerenUE	EC-2002-1
Mississippi River Transmission	RP96-199-000
Williams Natural Gas Company	RP96-173-000
Williams Natural Gas Company	RP95-136-000
Williams Natural Gas Company	RP94-365-000
Laclede Gas Company	GR-94-220
Western Resources	GM-94-40

CASE PROCEEDING PARTICIPATION

ROBERT E. SCHALLENBERG

<u>COMPANY</u>	<u>CASE NO.</u>
Western Resources	GR-93-240
St. Joseph Light & Power Company	ER-93-41
Southwestern Bell Telephone Company	TC-93-224
St. Joseph Light & Power Company	EC-92-214
Kansas Power & Light Company	GR-91-291
Kansas Power & Light Company	EM-91-213
Arkansas Power & Light Company	EM-91-29
Missouri Public Service Company	ER-90-101
Southwestern Bell Telephone Company	TR-90-98
General Telephone	TR-89-182
Southwestern Bell Telephone Company	TO-89-56
Southwestern Bell Telephone Company	TC-89-14
Union Electric Company	EC-87-114
General Telephone	TC-87-57
General Telephone	TM-87-19
General Telephone	TR-86-148
Southwestern Bell Telephone Company	TR-86-84
Kansas City Power & Light Company	EO-85-185
Kansas City Power & Light Company	ER-85-128
Southwestern Bell Telephone Company	TR-83-253
Kansas City Power & Light Company	ER-83-49
Southwestern Bell Telephone Company	TR-82-199
Kansas City Power & Light Company	HR-82-67
Kansas City Power & Light Company	ER-82-66
Southwestern Bell Telephone Company	TO-82-3
Southwestern Bell Telephone Company	TR-81-208
Kansas City Power & Light Company	ER-81-42

CASE PROCEEDING PARTICIPATION

ROBERT E. SCHALLENBERG

<u>COMPANY</u>	<u>CASE NO.</u>
Southwestern Bell Telephone Company	TR-80-256
United Telephone Company of Missouri	TR-80-235
Kansas City Power & Light Company	ER-80-204
Kansas City Power & Light Company	ER-80-48
Kansas City Power & Light Company	ER-80-48
Southwestern Bell Telephone Company	TR-79-213
Gas Service Company	GR-79-114
Missouri Public Service Company	ER-79-60
Missouri Public Service Company	ER-79-61
Kansas City Power & Light Company	ER-78-252
Missouri Public Service Company	GR-78-30
Missouri Public Service Company	ER-78-29
Gas Service Company	GR-78-70
Kansas City Power & Light Company	ER-77-118

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

Grain Belt Express Clean Line, LLC
Case No. EA-2016-0358
Date: January 24, 2017 (Rebuttal Report)
Areas: Public Comments

Spire, Incorporated
EnergySouth, Inc.
Case No. GM-2016-0342
Date: September 1, 2016 (Investigation Report)
Areas: Affiliated Transactions

Great Plains Energy Incorporated
Westar Energy, Inc.
Case No. EM-2016-0324
Date: July 25, 2016 (Investigation Report)
Areas: Affiliated Transactions

Kansas City Power & Light Company
Case No. ER-2016-0285
Date: January 27, 2017 (Surrebuttal)
Areas: Affiliate Transactions

The Empire District Electric Company,
Liberty Utilities (Central) Co. and Liberty Sub Corp.
Case No. EM-2016-0213
Date: July 20, 2016 (Rebuttal)
Areas: Affiliated Transactions

Laclede Gas Company
Case No. GF-2015-0181
Date: June 18, 2015 (Affidavit)
Areas: Finance Authority

The Empire District Electric Company
Case No. AO-2012-0062
Date: September 9, 2016 (Direct)
Areas: Affiliated Transactions; Cost Allocation Manual

KCP&L Greater Missouri Operations Company
Case No. ER-2010-0356
Date: November 4, 2010 (Report)
Areas: Construction Audit and Prudence Review

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

Kansas City Power & Light Company
Case No. ER-2010-0355
Date: November 4, 2010 (Report)
Areas: Construction Audit and Prudence Review

Great Plains Energy Incorporated,
Kansas City Power & Light Company
Case No. ER-2009-0090
Date: April 9, 2009 (Surrebuttal)
Areas: Iatan Prudence Review

Great Plains Energy Incorporated,
Kansas City Power & Light Company
Case No. ER-2009-0089
Date: April 7, 2009 (Surrebuttal)
Areas: Iatan Prudence Review

Great Plains Energy Incorporated,
Kansas City Power & Light Company, Aquila, Inc.
Case No. EM-2007-0374
Date: October 12, 2007 (Rebuttal and
Staff Report of Evaluation and Recommendations)
Areas: GPE Acquisition of Aquila

Union Electric Company, d/b/a AmerenUE
Case No. ER-2007-0002
Date: February 28, 2007 (Surrebuttal)
Areas: EEInc.
Date: January 31, 2007 (Rebuttal)
Areas: EEInc. and 4 CSR 240-10.020

Missouri Pipeline Company
Case No. GC-2006-0491
Date: September 6, 2006 (Direct)
November 17, 2006 (Surrebuttal)
Areas: Affiliate Transactions, Tariff Violations and Associated Penalties;
Transportation Tariffs

Aquila, Inc.
Case No. ER-2005-0436
Date: October, 14 2005 (Direct)
December 13, 2005 (Surrebuttal)
Areas: Unit Ownership Costs

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

Union Electric Company, d/b/a AmerenUE

Case No. EA-2005-0180

Date: October 15, 2005 (Rebuttal)

Areas: East Transfer

Union Electric Company d/b/a AmerenUE

Case No. EC-2002-1

Date: June 24, 2002 (Surrebuttal)

Area: Overview, 4 CSR 240-10.020, Alternative Regulation Plan

Laclede Gas Company

Case No. GR-94-220

Date: July 1, 1994 (Direct)

Areas: Property Taxes, Manufactured Gas Accruals, Deregulated Cost Assignments

Western Resources, Inc.,

dba Gas Service, a Western Resources Company

Case No. GM-94-40

Date: November 29, 1993 (Rebuttal)

Areas: Jurisdictional Consequences of the Sale of Missouri Gas Properties

Kansas Power & Light Company

Case No. EM-91-213

Date: April 15, 1991 (Rebuttal)

Areas: Purchase of Kansas Gas & Electric Company

Arkansas Power & Light Company and Union Electric Company

Case No. EM-91-29

Date: 1990-1991

Areas: No pre-filed rebuttal testimony by Staff before non-unanimous stipulation and agreement reached.

General Telephone Company of the Midwest

Case No. TM-87-19

Date: December 17, 1986

Areas: Merger

Union Electric Company

Case No. EC-87-114

Date: September 9, 1987 (Surrebuttal)

Date: April 24, 1987 (Direct)

Areas: Elimination of Further Company Phase-In Increases, Write-Off of Callaway I to Company's Capital Structure

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

General Telephone Company of the Midwest

Case No. TC-87-57

Date: December 22, 1986

Areas: Background and Overview, GTE Service Corporation, Merger Adjustment,
Adjustments to Income Statement

Southwestern Bell Telephone Company

Case No. TR-86-84

Date: 1986

No prefiled direct testimony by Staff - case settled before Staff direct testimony filed.

Kansas City Power & Light Company

Case Nos. EO-85-185 and ER-85-128

Date: April 11, 1985

Areas: Phase I - Electric Jurisdictional Allocations

Date: June 21, 1985

Areas: Phase III - Deferred Taxes Offset to Rate Base

Date: July 3, 1985

Areas: Phase IV - 47% vs. 41.5% Ownership, Interest, Phase-In, Test Year/True-Up,
Decision to Build Wolf Creek, Non-Wolf Creek Depreciation Rates, Depreciation
Reserve

Southwestern Bell Telephone Company

Case No. TR-83-253

Date: September 23, 1983

Areas: Cost of Divestiture Relating to AT&T Communications, Test Year, True-Up,
Management Efficiency and Economy

Kansas City Power & Light Company

Case No. ER-83-49

Date: February 11, 1983

Areas: Test Year, Fuel Inventories, Other O&M Expense Adjustment, Attrition Adjustment,
Fuel Expense-Forecasted Fuel Prices, Deferred Taxes Offset to Rate Base

Kansas City Power & Light Company

Case Nos. ER-82-66 and HR-82-67

Date: March 26, 1982

Areas: Indexing/Attrition, Normalization vs. Flow-Through, Deferred Taxes as an Offset to
Rate Base, Annualization of Amortization of Deferred Income Taxes, Cost of
Money/Rate of Return, Allocations, Fuel Inventories, Iatan AFDC Associated with
AEC Sale, Forecasted Coal and Natural Gas Prices, Allowance for Known and
Measurable Changes

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

Southwestern Bell Telephone Company

Case No. TR-82-199

Date: August 27, 1982

Areas: License Contract, Capitalized Property Taxes, Normalization vs. Flow-Through,
Interest Expense, Separations, Consent Decree, Capital Structure Relationship

Generic Telecommunications

Straight Line Equal Life Group and Remaining Life Depreciation Methods

Case No. TO-82-3

Date: December 23, 1981

Areas: Depreciation

Southwestern Bell Telephone Company

Case No. TR-81-208

Date: August 6, 1981

Areas: License Contract, Flow-Through vs. Normalization

Kansas City Power & Light Company

Case No. ER-81-42

Date: March 13, 1981

Areas: Iatan (AEC Sale), Normalization vs. Flow-Through, Allocations, Allowance for
Known and Measurable Changes

Southwestern Bell Telephone Company

Case No. TR-80-256

Date: October 23, 1980

Areas: Flow-Through vs. Normalization

United Telephone Company of Missouri

Case No. TR-80-235

Date: December 1980

Areas: Rate of Return

Kansas City Power & Light Company

Case Nos. ER-80-48 and ER-80-204

Date: March 11, 1980

Areas: Iatan Station Excess Capacity, Interest Synchronization, Allocations

Southwestern Bell Telephone Company

Case No. TR-79-213

Date: October 19, 1979

Areas: Income Taxes, Deferred Taxes

**CASE SUMMARY OF INVOLVEMENT
OF
ROBERT E. SCHALLENBERG**

Gas Service Company
Case No. GR-79-114
Date: June 15, 1979
Areas: Deferred Taxes as an Offset to Rate Base

Missouri Public Service Company
Case Nos. ER-79-60 and GR-79-61
Date: April 9, 1979
Areas: Depreciation Reserve, Cash Working Capital

Missouri Public Service Company
Case Nos. ER-78-29 and GR-78-30
Date: August 10, 1978
Areas: Fuel Expense, Electric Materials and Supplies, Electric and Gas Prepayments,
Electric and Gas Cash Working Capital, Electric Revenues

While in the employ of the Kansas State Corporation Commission in 1978, Mr. Schallenberg worked on a Gas Service Company rate case and rate cases of various electric cooperatives.