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Witness: Natelle Dietrich
Sponsoring Party: MoPSC Staff
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Case Nos.: ER-2018-0145 and
ER-2018-0146
Date Testimony Prepared: June 19, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

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DIRECT TESTIMONY

OF

NATELLE DIETRICH

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. ER-2018-0145

and

KCP&L GREATER MISSOURI OPERATIONS COMPANY

CASE NO. ER-2018-0146

*Jefferson City, Missouri
June, 2018*

Staff Exhibit No. 203
Date 9-25-18 Reporter JW
File No. ER-2018-0145
0146

1 DIRECT TESTIMONY

2 OF

3 NATELLE DIETRICH

4 KANSAS CITY POWER & LIGHT COMPANY

5 and

6 KCP&L GREATER MISSOURI OPERATIONS COMPANY

7 CASE NOS. ER-2018-0145 and ER-2018-0146

8 Q. Please state your name and business address.

9 A. My name is Natelle Dietrich. My business address is 200 Madison Street,
10 Jefferson City, Missouri 65101.

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

12 A. I am employed by the Missouri Public Service Commission ("Commission")
13 as Commission Staff Director.

14 Q. Please describe your education and relevant work experience.

15 A. I received a Bachelor's of Arts Degree in English from the University of
16 Missouri, St. Louis, and a Master's of Business Administration from William Woods
17 University. During my tenure with the Commission, I have worked in many areas of
18 telecommunications regulation. In October 2007, I became the Director of Utility Operations.
19 The division was renamed the Tariff, Safety, Economic and Engineering Analysis Department
20 in August 2011. In October 2015, I assumed my current position as Commission Staff
21 Director. In this position, I oversee all aspects of the Commission Staff.

22 My responsibilities include involvement in several activities related to implementing
23 sound energy policy in Missouri. I was a member of the Missouri Delegation to

1 the Missouri/Moldova Partnership through NARUC and the US Agency for
2 International Development.

3 I am a member of the National Association of Regulatory Utility Commissioners
4 Subcommittee on Rate Design and the Staff Subcommittee on Telecommunications. I serve
5 on the Staff of the Federal/State Joint Board on Universal Service, serve as lead Staff for the
6 Missouri Universal Service Board, and was a member of the Governor's MoBroadbandNow
7 taskforce.

8 Q. Have you previously testified before the Commission?

9 A. Yes. My Case Summary is attached as Schedule ND-d1.

10 **EXECUTIVE SUMMARY**

11 Q. What is the purpose of your testimony?

12 A. The purpose of my testimony is to sponsor the Staff's Cost of Service Report
13 that is being filed concurrently with this testimony, provide an overview of Staff's cost-of-
14 service calculation and revenue requirement recommendation, and if requested at hearing,
15 address questions of a general or policy nature regarding the work performed by, or the
16 positions taken by, Staff in this proceeding.

17 Q. Is Staff filing anything other than your testimony and Staff's Cost of Service
18 Report at this time?

19 A. Yes. Staff is also separately filing its accounting schedules. On July 6, 2018,
20 Staff will file separate direct testimony and a report on its class cost-of-service and rate design
21 analyses and recommendations.

22 Q. What did Staff review for Staff's Cost of Service Report?

1 A. Staff reviewed all the cost-of-service components (capital structure, return on
2 rate base, rate base, depreciation expense and operating expenses) that comprise Kansas City
3 Power & Light Company's ("KCPL") and KCP&L Greater Missouri Operation's ("GMO")
4 revenue requirements based on the 12-months ending June 30, 2017, updated through
5 December 31, 2017.

6 Q. Based on Staff's review, what are Staff's recommendations concerning
7 KCPL's and GMO's revenue requirement?

8 A. For KCPL and GMO, Staff recommends an allowed return on equity ("ROE")
9 range of 9.00% to 10.00%, with a point estimate of 9.85%, which yields a rate of return of
10 7.36% for KCPL and 7.35% for GMO.

11 Staff's revenue requirement for KCPL, after adjustment for the federal Tax Cuts and
12 Jobs Act of 2017 ("TCJA"), is <\$19,076,751>.¹ Staff's results that support its revenue
13 requirement for KCPL are presented in the Accounting Schedules that are separately filed as
14 an exhibit in the case concurrently with this testimony.

15 Staff's revenue requirement for GMO, after adjusted for the TCJA is <\$34,812.142>.
16 Staff's revenue requirement also reflects an adjustment for Crossroad transmission, which the
17 Commission has previously disallowed, and the removal of an approximate \$7.2 million
18 amortization expense for depreciation. . Staff's results that support its revenue requirement for
19 GMO are presented in the Accounting Schedules that are separately filed as an exhibit in the
20 case concurrently with this testimony.

21 Q. What rate increases are KCPL and GMO requesting?

¹ A "<bracketed number>" represents a negative amount.

1 A. KCPL and GMO filed their Direct Testimonies on January 30, 2018,
2 requesting increases in revenues of \$16.4 million, and \$19.3 million, respectively, including
3 the rebasing of fuel for each company's FAC. For a typical residential customer, KCPL
4 expects the increase would be approximately \$3 per month, and GMO expects it would be
5 approximately \$2 per month. KCPL and GMO are requesting ROEs of 9.85%.

6 Q. According to KCPL and GMO, what factors are driving the
7 requested increases?

8 A. KCPL and GMO state their costs of operation, maintenance, fuel and purchase
9 power (net of off-system sales margins), transmission fees charged by regional transmission
10 organizations, property taxes and lower average annual weather normalized demand driven by
11 reduced usage per customer have resulted in a revenue deficiencies since the Commission
12 approved KCPL's and GMO's last rate requests in May 2017 and September 2016
13 respectively. KCPL and GMO also acknowledge that current rates will need to be adjusted to
14 reflect changes in the Federal Tax Cuts and Jobs Act of 2017.

15 Q. Are the requested rate increases related to Great Plains Energy's application
16 for approval of its merger with Westar Energy, Inc.?

17 A. In his direct testimonies for both KCPL and GMO, Darrin Ives indicates
18 efficiency savings associated with labor and benefit costs will be reflected in these cases.
19 KCPL and GMO are also requesting to defer transition costs incurred through the proposed
20 true-up date over four years.

21 Q. Have there been any changes related to the merger application since the filing
22 of direct testimony in this case?

1 A. Yes. On January 12, 2018, Great Plains Energy Incorporated, Kansas City
2 Power & Light Company, KCP&L Greater Missouri Operations Company, and Westar
3 Energy, Inc. (“Applicants”), Brightergy, LLC (“Brightergy”), Missouri Joint Municipal
4 Electric Utility Commission (“MJMEUC”), and Staff filed a Stipulation and Agreement in
5 Case No. EM-2018-0012. On March 8, 2018, the Applicants, the Office of the Public
6 Counsel (“OPC”), Midwest Energy Consumers Group (“MECG”), Brightergy, MJMEUC,
7 and Staff (collectively, “Signatories”) filed a second Stipulation and Agreement. The
8 Signatories agreed to support, in this rate case, deferral of merger transition costs of
9 \$7,209,208 for GMO, and agreed to recommend recovery through amortization of such
10 merger transitions costs over a 10-year period beginning when such costs have been included
11 in base rates, with no carrying costs or rate base inclusion allowed for the unamortized portion
12 of such costs. In addition, the Applicants agreed to payment of a one-time lump sum bill
13 credit for KCPL and GMO customers within 120 days of the closing of the merger. The
14 amount of bill credits allocated to KCPL-MO and GMO are \$14,924,840 and \$14,205,828,
15 respectively. The March 2018 Stipulation and Agreement outlines the agreed upon allocation
16 of bill credit amounts among the rate classes of each utility.

17 On May 24, 2018, the Commission issued its Report and Order approving the merger
18 with the conditions contained in the January and March 2018 Stipulation and Agreements.
19 The Kansas Corporation Commission (“KCC”) also approved the merger on May 24, 2018.

20 Q. Does Staff address other issues in its Cost-of-Service Report?

21 A. Yes. On December 22, 2017, the TCJA was signed into law effective
22 January 1, 2018. One of the main provisions of the TCJA was a reduction to the corporate
23 income tax rate from 35% to 21%. Staff addressed known changes in the tax law as part of

1 Staff's recommended normalized taxes. The tax rate reduction, by extension, also impacts
2 deferred income taxes. Deferred income taxes were generated or created at the higher income
3 tax rate in effect at that time. With the recent reduction to this tax rate, deferred taxes will
4 have to be adjusted as those benefits are "flowed" back to customers over the life of the assets
5 giving rise to the deferred taxes. Staff reflected the deferred tax balance as of December 31,
6 2017, for the update period, as a reduction to rate base, including the full amount of excess
7 deferred taxes not yet returned to customers.

8 Additionally, both KCPL and GMO are requesting recovery of costs associated
9 with their Clean Charge Network ("CCN") charging stations. However, in Case No.
10 ER-2016-0285, *In the Matter of Kansas City Power & Light Company's Request for Authority*
11 *to Implement a General Rate Increase for Electric Service*, the Commission found that
12 electric vehicle charging stations are not "electric plant" as defined by Section 386.020(14),
13 RSMo, which means the Commission has no statutory authority to regulate their operations.
14 As such, Staff has removed these costs from KCPL's and GMO's costs of service. Staff will
15 further address the CCN issues in its rebuttal testimony.

16 **REPORT ON COST OF SERVICE**

17 Q. How is the Staff's Cost-of-Service Report organized?

18 A. Staff's Report includes its analyses, reviews and recommendations for both
19 KCPL and GMO. Where there are KCPL or GMO-specific issues, the Report clearly
20 delineates those issues.

21 The Rate Base and Income Statement sections of Staff's Cost of Service Report have
22 numerous subsections that explain each specific adjustment Staff made to the EMS runs Staff
23 developed in these cases. The Staff member responsible for writing each subsection of the

1 report is identified at the end of the subsection. The affidavit of each Staff person who
2 contributed to the report is included in an appendix to the report.

3 Short forms used in the Staff's Cost of Service Report and Class Cost of Service
4 Report include:

5 "Commission" for the Missouri Public Service Commission;

6 "Staff" for the Staff of the Missouri Public Service Commission;

7 "OPC" for the Office of the Public Counsel;

8 "KCPL" for Kansas City Power & Light Company;

9 "GMO" for KCP&L Greater Missouri Operations;

10 "GPE" for Great Plains Energy, Inc.;

11 "Westar" for Westar Energy, Inc.

12 "EMS" for Staff's revenue requirement model referred to as Exhibit Modeling System

13 "USOA" for the Uniform System of Accounts Prescribed for Public Utilities and

14 Licensees subject to the provisions of the Federal Power Act, as prescribed by the

15 Federal Energy Regulatory Commission (FERC) and published at 18 CFR Part

16 101 (1992) and 1 FERC Stat. & Regs. paragraph 15,001 and following (1992).

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

18 Q. How does one determine the revenue requirement for a regulated utility?

19 A. The first step is to calculate the cost-of-service. The cost-of-service for a
20 regulated utility can be defined by the following formula:

21 Cost of Service = Cost of Providing Utility Service

22 or

23
$$COS = O + (V-D)R \text{ where,}$$

Direct Testimony of
Natelle Dietrich

1 COS = Cost-of-Service

2 O = Adjusted Operating Costs (Payroll, Maintenance, etc.), Depreciation
3 Expense and Taxes

4 V = Gross Valuation of Property Required for Providing Service

5 D = Accumulated Depreciation Representing Recovery of Gross
6 Property Investment

7 R = Allowed Rate of Return

8 V - D = Rate Base (Gross Property Investment less Accumulated
9 Depreciation = Net Property Investment)

10 (V - D)R = Return Allowed on Net Property Investment

11 Q. Once cost-of-service is calculated, how does one determine the revenue
12 requirement?

13 A. Revenue requirement is the difference between the calculated cost-of-service
14 and the adjusted current revenues.² That difference represents the regulated utility's
15 necessary rate relief and can be defined by the following formula:

16 RR = COS - CR where,

17 RR = Revenue Requirement

18 COS = Cost-of-Service

19 CR = Adjusted Current Revenues

20 Q. Does this conclude your direct testimony?

21 A. Yes, it does.

² It should be noted that often the terms "cost-of-service" and "revenue requirement" are used interchangeably to refer to what is defined as "cost-of-service" above.

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
)
)
) and

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
)
)
)

AFFIDAVIT OF NATELLE DIETRICH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW NATELLE DIETRICH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Direct Testimony* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

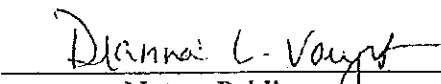


NATELLE DIETRICH

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19th day of June 2018.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377



Notary Public

**Natelle Dietrich
Case Summary**

Presented testimony or analysis through affidavits on the following cases and proceedings:

- Case No. TA-99-405, an analysis of the appropriateness of a “payday loan” company providing prepaid telecommunications service.
- Case No. TX-2001-73, In the Matter of Proposed New Rules on Prepaid Calling Cards.
- Case No. TO-2001-455, the AT&T/Southwestern Bell Telephone Company arbitration, which included issues associated with unbundled network elements.
- Case No. TX-2001-512, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-33.010, 33.020, 33.030, 33.040, 33.060, 33.070, 33.080, 33.110, and 33.150 (telecommunications billing practices).
- Case No. TO-2002-222, the MCI/SWBT arbitration.
- Case No. TR-2002-251, In the Matter of the Tariffs Filed by Sprint Missouri, Inc. d/b/a Sprint to Reduce the Basic Rates by the Change in the CPI-TS as Required by 392.245(4), Updating its Maximum Allowable Prices for Non-Basic Services and Adjusting Certain Rates as Allowed by 392.245(11) and Reducing Certain Switched Access Rates and Rebalancing to Local Rates as Allowed by 392.245(9).
- Case No. TX-2002-1026, In the Matter of a Proposed Rulemaking to Implement the Missouri Universal Service Fund End-User Surcharge.
- Case No. TX-2003-0379, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-3.545, formerly 4 CSR 240-30.010 (tariff filing requirements).
- Case No. TX-2003-0380, In the Matter of Proposed Amendments to Commission Rules 4 CSR 240-2.060, 4 CSR 240-3.020, 4 CSR 240-3.510, 4 CSR 240-3.520, and 4 CSR 240-3.525 (competitive local exchange carrier filing requirements and merger-type transactions).
- Case No. TX-2003-0389, In the Matter of Proposed Amendment to Commission Rules 4 CSR 240-3.530 and 4 CSR 240-3.535, and New Rules 4 CSR 240-3.560 and 4 CSR 240-3.565 (telecommunications bankruptcies and cessation of operation).
- Case No. TX-2003-0445, In the Matter of a Proposed New Rule 4 CSR 240-33.160 Regarding Customer Proprietary Network Information.
- Case No. TX-2003-0487, In the Matter of Proposed Commission Rules 4 CSR 240-36.010, 36.020, 36.030, 36.040, 36.050, 36.060, 36.070, and 36.080 (arbitration and mediation rules).
- Case No. TX-2003-0565, In the Matter of a Proposed Rulemaking to Codify Procedures for Telecommunications Carriers to Seek Approval, Amendment and Adoption of Interconnection and Resale Agreements.
- Case Nos. TX-2004-0153 and 0154, in the Matter of Proposed Rule for 211 Service (emergency and permanent rules).

- Case Nos. TO-2004-0370, IO-2004-0467, TO-2004-0505 et al, In the Matter of the Petition of various small LECs for Suspension of the Federal Communications Commission Requirement to Implement Number Portability.
- Case No. TX-2005-0258, In the Matter of a New Proposed Rule 4 CSR 240-33.045 (placement and identification of charges on customer bills).
- Case No. TX-2005-0460, In the Matter of the Proposed Amendments to the Missouri Universal Service Fund Rules.
- Case No. TO-2006-0093, In the Matter of the Request of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, for Competitive Classification Pursuant to Section 392.245.6, RSMo (2205) – 30-day Petition.
- Case Nos. TC-2005-0357, IR-2006-0374, TM-2006-0306, the complaint case, earnings investigation and transfer of assets case to resolve issues related to Cass County Telephone Company, LP, LEC Long Distance, FairPoint Communications, Inc., FairPoint Communications Missouri Inc. d/b/a FairPoint Communications and ST Long Distance Inc. db/a FairPoint Communications Long Distance.
- Case No. TC-2006-0068, FullTel, Inc., v. CenturyTel of Missouri, LLC.
- Case No. TX-2006-0169, In the Matter of Proposed New Rule 4 CSR 240-3.570 Regarding Eligible Telecommunications Carrier Designations for Receipt of Federal Universal Service Fund Support.
- Case No. TX-2006-0429, In the Matter of a Proposed Amendment to 4 CSR 240-3.545 (one day tariff filings).
- Case No. TX-2007-0086, In the Matter of a Proposed Rulemaking to Create Chapter 37 – Number Pooling and Number Conservation Efforts
- Case No. TA-2009-0327, In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households.
- Case No. RA-2009-0375, In the Matter of the application of Nexus Communications, Inc. dba TSI for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households.
- Case No. AX-2010-0061, Office of Public Counsel’s Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers.
- Case No. GT-2009-0056, In the Matter of Laclede Gas Company’s Tariff Revision Designed to Clarify its Liability for Damages Occurring on Customer Piping and Equipment Beyond the Company’s Meter.
- Case No. ER-2012-0166, In the Matter of Union Electric Company d/b/a Ameren Missouri’s Tariffs to Increase Its Revenues for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0174, In the Matter of Kansas City Power & Light Company’s Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).

- Case No. ER-2012-0175, In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0345, In the Matter of Empire District Electric Company of Joplin, Missouri Tariff's Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company. Energy Independence and Security Act of 2007 (EISA).
- File Nos. EO-2013-0396 and EO-2013-0431, In the Matter of the Joint Application of Entergy Arkansas, Inc., Mid South TransCo, LLC, Transmission Company Arkansas, LLC and ITC Midsouth LLC for Approval of Transfer of Assets and Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions; and In the Matter of Entergy Arkansas, Inc.'s Notification of Intent to Change Functional Control of Its Missouri Electric Transmission Facilities to the Midwest Independent Transmission System Operator Inc. Regional Transmission System Organization or Alternative Request to Change Functional Control and Motions for Waiver and Expedited Treatment, respectively.
- Case No. MX-2013-0432, In the Matter of a Proposed Rulemaking to Revise Manufactured Housing Rules Regarding Installation and Monthly Reporting Requirements.
- Case No. TX-2013-0324, In the Matter of a Proposed Rulemaking to the Missouri Universal Service Fund.
- Case No. EO-2014-0095, In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish Demand-Side Programs Investment Mechanism.
- Case No. EA-2014-0207, In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line.
- Case No. ER-2014-0370, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.
- Case No. WR-2015-0301, In the Matter of Missouri-American Water Company's Request for Authority to Implement a General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.
- Case No. ER-2016-0156, 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. ET-2016-0246, In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Approval of a Tariff Setting a Rate for Electric Vehicle Charging Stations.
- Case No. ER-2016-0285, 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-2016-0179, In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase its Revenues for Electric Service.

- Case No. EE-2017-0113, In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for a Variance from the Commission's Affiliate Transactions Rule, 4 CSR 240-20.015
 - Case No. EA-2016-0358, In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345kV Transmission Line
 - Case No. EM-2017-0226, In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Acquisition of Westar Energy, Inc.
 - Case No. GR-2017-0215, In the Matter of Laclede Gas Company's Request to Increase its Revenues for Gas Service.
 - Case No. GR-2017-0216, In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to increase its Revenues for Gas Service.
 - Case No. WR-2017-0259, In the Matter of the Rate Increase Request of Indian Hills Utility Operating Company, Inc.
 - Case No. WR-2017-0285, In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.
 - Case No. EM-2018-0012, In the Matter of the Application of Great Plains Energy Incorporated for Approval of its Merger with Westar Energy, Inc.
 - Case No. EO-2018-0092, In the Matter of the Application of The Empire District Electric Company for Approval of Its Customer Savings Plan.
 - Case No. GR-2018-0013, In the Matter of Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty Utilities' Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company.
 - Case No. EX-2018-0189, In the Matter of the Amendment of the Commission's Rule Regarding Applications for Certificates of Convenience and Necessity.
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- Actively participated in or prepared comments on numerous issues on behalf of the Commission to be filed at the Federal Communications Commission.
 - Prepared congressional testimony on behalf of the Commission on number conservation efforts in Missouri.
 - A principal author on Missouri Public Service Commission Comments on the Reduction of Carbon Emissions in Missouri under Section 111(d) of the Clean Air Act.
 - A principal author on Missouri Public Service Commission Comments on the Environmental Protection Agency's "Emission Guidelines for Existing Stationary Sources: Electric Generating Unity".

Commission Arbitration Advisory Lead Staff for the following cases:

- Case No. TO-2005-0336, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri's Petition for Compulsory Arbitration of Unresolved Issues For a Successor Interconnection Agreement to the Missouri 271 Agreement ("M2A").
- Case No. IO-2005-0468, In the Matter of the Petition of Alma Telephone Company for Arbitration of Unresolved Issues Pertaining to a Section 251(b)(5) Agreement with T-Mobile USA, Inc.
- Case No. TO-2006-0147 et al, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with T-Mobile USA, Inc and Cingular Wireless.
- Case No. TO-2006-0299, Petition of Socket Telecom, LLC for Compulsory Arbitration of Interconnection Agreements with CenturyTel of Missouri, LLC and Spectra Communications, LLC, pursuant to Section 251(b)(1) of the Telecommunications Act of 1996.
- Case No. TO-2006-0463, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with ALLTEL Wireless and Western Wireless.
- Case No. TO-2009-0037, In the Matter of the Petition of Charter Fiberlink-Missouri, LLC for Arbitration of an Interconnection Agreement Between CenturyTel of Missouri, LLC and Charter Fiberlink-Missouri, LLC.