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|---|---|
| *Exhibit No.:* | |
| *Issues:* | *Cash Working Capital; Payroll; Payroll Taxes; Incentive Compensation; Bonuses; Materials and Supplies; Customer Deposits and Interest; Customer Advances; and Employee Benefits* |
| *Witness:* | *Dana E. Eaves* |
| *Sponsoring Party:* | *MoPSC Staff* |
| *Type of Exhibit:* | *Direct Testimony* |
| *Case No.:* | *GR-2004-0209* |
| *Date Testimony Prepared:* | *April 15, 2004* |

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

# DIRECT TESTIMONY

# OF

# DANA E. EAVES

**MISSOURI GAS ENERGY**

**CASE NO. GR-2004-0209**

*Jefferson City, Missouri*
*April 2004*

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

| | | |
|---|---|---|
| In the Matter of Missouri Gas Energy's<br>Tariffs to Implement a General Rate<br>Increase for Natural Gas Service | )<br>)<br>) | Case No. GR-2004-0209 |

AFFIDAVIT OF DANA E. EAVES

| | | |
|---|---|---|
| STATE OF MISSOURI | ) | |
| | ) | ss. |
| COUNTY OF COLE | ) | |

Dana E. Eaves, being of lawful age, on his oath states: that he has participated in the preparation of the following direct testimony in question and answer form, consisting of 18 pages to be presented in the above case; that the answers in the following direct testimony 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.

Dana E. Eaves

Dana E. Eaves

Subscribed and sworn to before me this 14th day of April 2004.

D SUZIE MANKIN
Notary Public - Notary Seal
STATE OF MISSOURI
COLE COUNTY
MY COMMISSION EXP. JUNE 21,2004

D Suzie Mankin

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**DIRECT TESTIMONY**

**OF**

**DANA E. EAVES**

**MISSOURI GAS ENERGY**

**CASE NO. GR-2004-0209**

Q. Please state your name and business address.

A. Dana E. Eaves, PO Box 360, Suite 440, Jefferson City, MO 65102.

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

A. I am a Utility Regulatory Auditor for the Missouri Public Service Commission (Commission or PSC).

Q. Please describe your educational and employment background.

A. I graduated from Columbia College in May 1995 with a Bachelors of Science degree in Business Administration with an emphasis in Accounting. I commenced employment with the Commission Staff (Staff) in April 2001. Prior to employment with the Commission, I held the position of Accountant with Midwest Block and Brick, Inc.; Vice President of Operations with Practice Management Plus, a healthcare consulting firm; and Director of Finance with Capital City Medical Associates.

Q. What has been the nature of your duties while employed by the Commission?

A. I am responsible for assisting in the audits and examinations of the books and records of utility companies operating within the state of Missouri.

Q. What knowledge, skills, experience, training or education do you have in these areas of which you are testifying as an expert witness?

A. I have been assigned to and filed testimony in previous cases as described in Schedule 1, attached to this testimony. I have also extensively reviewed other utility rate cases related to the issues I am sponsoring to ensure the consistency of the Staff's method and procedures. My prior academic education helped prepare me to successfully sponsor the ratemaking areas I've been assigned in this case. I have received certificates of training from the National Association of Regulatory Utility Commissioners in seminars it has sponsored concerning water, gas and electric utility cost of service and regulation. Further, I have attended numerous in-house training seminars at the Commission specifically designed for continuing education and training in the areas of regulatory issues. I have also worked closely with Senior Staff members familiar with my areas of responsibility.

Q. Please describe your principal areas of responsibility in this case.

A. I am responsible for the rate base components of cash working capital, materials and supplies, prepayments, customer deposits and customer advances; and payroll, payroll taxes, incentive compensation, bonuses, customer deposit interest and employee benefits components of the income statement.

Q. What Accounting Schedules are you sponsoring in this case?

A. I am sponsoring Accounting Schedule 8, Cash Working Capital, which details the Staff's calculation of Missouri Gas Energy's (MGE or Company) cash working capital requirement.

Q. Please identify any adjustments that you are sponsoring.

A. I am sponsoring the following Income Statement adjustments:

Payroll Tax Expense: S-61.1

Interest on Customer Deposits: S-57.1

Dental Expense: S-52.8

401(K) Expense: S-52.3

Retirement Power benefits: S-52.6

Life, Accidental Death and Disability (AD&D) and Long Term Disability Expense: S-52.7

I am sponsoring the following payroll adjustments: S-12.1, S-13.1, S-14.1, S-16.1, S-17.1, S-18.1, S-19.1, S-20.1, S-21.1, S-23.1, S-24.1, S-25.1, S-27.1, S-28.1, S-29.1, S-30.1, S-31.1, S-32.1, S-33.1, S-34.1, S-35.1, S-39.1, S-43.1, S-46.1, S-47.4 and S-51.3.

I am also sponsoring the following incentive compensation and bonus adjustments: S-12.2, S-13.2, S-14.2, S-16.2, S-17.2, S-18.2, S-19.2, S-20.2, S-21.3, S-23.2, S-24.2, S-25.2, S-27.2, S-28.2, S-29.2, S-30.2, S-31.2, S-32.2, S-33.2, S-34.2, S-35.2, S-39.2, S-43.3, S-46.2, and S-47.6.

**<u>CASH WORKING CAPITAL (CWC)</u>**

Q. What is CWC?

A. CWC is the amount of cash necessary for the Company to pay the day-to-day expenses incurred to provide gas service to MGE's customers.

Q. Where are the results of the Staff's CWC analysis?

A. The results of CWC is reflected on the Rate Base Accounting Schedule – Schedule 2, line 4-Cash Working Capital, line 10-Federal Tax Offset, line 11-State Tax Offset, line 12-City Tax Offset and line 13-Interest Expense Offset.

Q. Is the method you used to calculate MGE's CWC requirement the same method the Staff has used in previous rate cases?

A. Yes, the method has been used by the Staff and adopted by the Commission in rate proceedings since the 1970s, and used in the Company's most recent rate cases (Case Nos. GR-96-285, GR-98-140 and GR-2001-292).

Q. What is the purpose of a lead/lag study?

A. A lead/lag study determines the amount of cash that is necessary on a day-to-day basis for the Company to provide gas service to its customers. We analyze the cash flows related to the payments the Company receives from its customers for the provision of gas service and the disbursements of funds made by the Company to its suppliers and vendors of goods and services necessary to provide this gas service.

In a lead/lag study we compare the number of days the Company has to make payments after receiving goods or services from a vendor, with the number of days it takes the Company to receive payment for the gas service provided to its customers. This analysis also identifies who provides CWC.

Q. What are the sources of CWC?

A. The shareholders and ratepayers.

Q. How do shareholders supply CWC?

A. When the Company expends funds to pay for an expense before the ratepayers provide the cash, then shareholders are the source of funds. This cash represents a portion of the shareholders' total investment in the Company. The shareholders are compensated for the CWC funds they provided by the inclusion of these funds in rate base. By including these funds in rate base, the shareholders earn a return on the funds they have invested.

Q. How do ratepayers provide CWC?

A. Ratepayers supply CWC when they pay for gas service they received before the Company pays the expenses it incurred to provide that service. Ratepayers are compensated for the CWC they provided by reducing rate base by the amount of customer-provided CWC.

Q. How has the Staff determined the amount of CWC provided by both the ratepayers and shareholders?

A. By performing a lead/lag study.

Q. How does the Staff interpret the lead/lag study results?

A. A positive CWC requirement indicates that, in the aggregate, the shareholders provided the CWC for the test year. This means that, on average, the Company paid the expenses incurred to provide the gas service to the ratepayers before the ratepayers paid for the service.

A negative CWC requirement indicates that, in the aggregate, the ratepayers provided the CWC during the test year. This means that, on average, the ratepayers paid for their gas service before the Company paid the expenses incurred to provide that service.

Q. Please explain the components of the Staff's calculation of CWC, which appears on Accounting Schedule 8.

A. The components of the Staff's calculation are as follows:

1) Column A (Account Description): lists the types of cash expense, which the Company pays on a day-to-day basis.

2) Column B (Test Year Expenses): the amount of annualized expense included in the cost of service. It shows the dollars

associated with the items listed in Column A on an adjusted Missouri jurisdictional basis.

3) Column C (Revenue Lag): the number of days between the midpoint of the provision of service by the Company and the payment for the service by the ratepayer. The revenue lag addressed in this case is discussed later in this direct testimony.

4) Column D (Expense Lag): the number of days between the receipt of and payment for the goods and services (i.e., cash expenditures) used to provide service to the ratepayer. The expense lags addressed in this case are discussed later in this direct testimony.

5) Column E (Net Lag): results from the subtraction of the Expense Lag (Column D) from the Revenue Lag (Column C).

6) Column F (Factor): expresses the CWC lag in days as a fraction of the total days in the test year. This is accomplished by dividing the Net Lags in Column E by 365.

7) Column G (CWC Requirement): the average amount of cash necessary to provide service to the ratepayer. This is computed by multiplying the Test Year Expenses (Column B) by the CWC Factor (Column F).

Q. Please describe the revenue lag.

A. The revenue lag is the amount of time between when the Company provides the service and when it receives payment from the ratepayers for that service. The overall revenue lag in this case is the sum of three subcomponent lags. They are the following:

1) Usage Lag: The midpoint of average time elapsed from the beginning of the first day of a service period through the last day of that service period.

2) Billing Lag: The period of time between the end of the last day of a service period and the day the bill is placed in the mail by the Company.

3) Collection Lag: The period of time between the day the bill is placed in the mail by the Company and the day the Company receives payment from the ratepayer for services performed.

Q. Did the Company use the same three subcomponent lags discussed above in developing its total revenue lag?

A. Yes. The Company's and the Staff's subcomponent and overall results are compared below:

| | Company | Staff |
|---|---|---|
| Usage Lag | 15.21 days | 15.21 days |
| Billing Lag | 6.50 days | 3.1736 days |
| Collection Lag | 25.54 days | 22.9145 days |
| Total | 46.50 days | 41.2511 days |

Q. Please explain how the Staff calculated the usage lag.

A. This lag was determined by dividing the number of days in a typical year (365) by the number of months in a year (12) to yield the average number of days in a month (30.42). This result was divided by two, which yielded an average usage lag of 15.21 days. The Staff used two as the divisor since MGE bills monthly, and the Staff assumed that service is delivered to the customer evenly throughout the month.

Q. Please explain how the Staff arrived at the billing lag.

A. The Staff reviewed the procedures used by the Company to mail bills to customers. The Company utilizes 21 billing cycles each month. This aids in smoothing out the billing process and provides a more level cash flow for the Company. Upon reading of the customer's meter, the Company puts the bills on hold for three business days for an internal review. On the fourth business day after the meters are read, the bills are placed in the mail and sent to the customer. This three-day review process was explained by the Company as being necessary to correct billing errors and omissions. The Company believes this additional time spent reviewing and correcting bills leads to fewer estimated bills being sent to the customer and better customer relations.

The Staff disagrees with the three-day review process because of the negative effect it has on the billing lag. The Staff has reviewed other billing lags of gas providers in Missouri and determined that the billing lag as calculated by the Staff in the last Laclede Gas Company (Laclede) case, Case No. GR-2002-356, of 3.1736 days is more representative of an appropriate billing lag based upon the size and type of gas distribution system the Company operates.

Q. Please explain the Staff's approach to determining the collection lag.

A. The collection lag is the average number of days that elapse between the day that the bill was mailed and the day the Company receives payment for that bill. The Staff used as its basis for the collection lag the Company's Accounts Receivable turnover calculation that MGE Company presented in their workpapers filed November 04, 2003. However, the Staff also removed the actual bad debt write-offs from the daily accounts receivable balances contained within in the Company's turnover calculation. With this modification, the Staff calculated an average collection lag of 22.9145 days.

Q. Why did the Staff remove the actual bad debt write-off from the daily balances?

A. Bad debt write-offs represent amounts that the Company will never recover from the customer and, therefore, should be removed from the calculation.

Q. What is the Staff's overall revenue lag for this case?

A. The revenue lag the Staff is proposing for this case is 41.2511 days.

Q. Why does the revenue lag for the Use Tax, Sales Tax and Gross Receipts Tax line items on Accounting Schedule 8 differ from the overall revenue lag?

A. For these taxes the Company acts solely as an agent of the taxing authority in collecting these amounts from the ratepayers and paying the proper taxing authorities. The Company has not provided any service to the ratepayers associated with these taxes. Therefore, the revenue lag for these taxes consists only of the collection lag.

Q. Has the Staff reviewed and analyzed the expense lags the Company is recommending in this case?

A. Yes, the Staff has reviewed all expense lags presented by the Company and accepts the expense lead/lag days as outlined in the Company's Schedule E-4 attached to the direct testimony of MGE witness Michael R. Noack in this proceeding, with the exception of the interest expense lag. The Staff is not aware of any significant changes that have occurred in the Company's accounting practices that would have a material impact on the expense lags accepted by the Staff.

Q. Which expense lags is the Staff proposing to add to that proposed by the Company?

A. The Staff is sponsoring a PSC assessment expense lag and a legal expense lag.

Q. Please explain the PSC assessment expense lag.

A. MGE pays its assessment quarterly. This lag was computed using actual amounts paid and the due dates of the quarterly payments. Calculations were based on the elapsed time between the midpoint of the quarterly assessment date and the dates the payments were made.

Q. Please explain the legal expense lag.

A. This lag represents the period of time between the midpoint that the service is provided and the bill is paid. The Staff calculated this expense lag to be 51.81.

Q. Please explain the interest expense offset.

A. Although not an O&M expense, interest expense is included in the Staff's lead/lag analysis because interest is a source of cash provided by the ratepayer and, therefore, properly considered in CWC. The Company has a known and certain obligation to pay cash, in the form of interest on its debt. The interest is pre-collected through rates from the ratepayer for the purpose of passing it on to the bondholder. The funds are a source of cash to the Company for use toward any purpose that it desires until they are passed on to the bondholder.

MGE's long-term debt bears monthly, semi-annual and quarterly interest. The lag represents the period of time between the midpoint of the periods and the date interest is paid. The Staff's calculation of the combined net expense lag computed for interest is 82.92 days (weighted total/amount paid). The CWC factor was placed in the Rate Base Accounting Schedule and the Staff's computer program calculated the CWC requirement for interest.

Q. Why are the interest expense and income tax offsets included in Rate Base (Accounting Schedule 2) rather than Cash Working Capital (Accounting Schedule 8)?

A. The normalized Missouri jurisdictional expense for these components are directly tied to the mechanical computation of the revenue requirement. The Staff's computer program has the capability to extract this amount from the Staff's Income Tax Accounting Schedule, apply the CWC factor to each component, and place the CWC requirement directly in Accounting Schedule 2. The expense lag for income taxes represents the period of time between the midpoint of the tax/calendar year and the dates the income taxes must be paid to the federal and state taxing authority. The expense lag for interest was described above.

Q. What was the overall result of the Staff's lead/lag calculation?

A. The lead/lag study performed by the Staff resulted in a negative CWC requirement. This means that in the aggregate the ratepayer has provided the CWC to the Company during the test year. Therefore, the ratepayer is compensated for the CWC that the ratepayer provides, through a reduction to rate base. This rate base offset is shown on Accounting Schedule 2.

**PAYROLL**

Q. Please explain adjustments S-12.1, S-13.1, S-14.1, S-16.1, S-17.1, S-18.1, S-19.1, S-20.1, S-21.1, S-23.1, S-24.1, S-25.1, S-27.1, S-28.1, S-29.1, S-30.1, S-31.1, S-32.1, S-33.1, S-34.1, S-35.1, S-39.1, S-43.1, S-46.1, S-47.4 and S-51.3.

A. As Staff Auditing witness Charles R. Hyneman explains in his direct testimony, the Staff is filing a test year of the twelve months ended June 30, 2003, updated for known and measurable events through December 31, 2003. I have therefore developed the payroll expense by annualizing payroll costs at December 31, 2003, for MGE. This approach takes into consideration actual employees, as well as authorized wage levels paid, as of December 31, 2003.

Q. How did the Staff develop payroll costs in this case?

A. The Staff requested payroll for each department and individual employed by MGE. This information was analyzed to track changes in the work force and to identify any areas that needed to be reviewed in further detail. Salary and wage rates were reviewed to determine the pay levels of the MGE employees.

I determined the salary and wage rates as of December 31, 2003, and applied those rates to employees that were included in the payroll costs as of that date. The annualized amount was compared to the test year per book amount at June 30, 2003, to identify the related adjustment to the annualized level as of December 31, 2003. The annualized amount was distributed to the Federal Energy Regulatory

Commission (FERC) Uniform System of Accounts by a payroll distribution percentage based on the payroll distribution percentage used for the test year.

Q. Are there any other adjustments made to the payroll annualization?

A. Yes, adjustments have been made to eliminate a portion of salaries attributable to lobbying activities preformed by the employees in the Customer and Government Relations Department. These adjustments are sponsored in the direct testimony of Staff Auditing witnesses Leslie L. Lonergan and Mr. Hyneman.

**PAYROLL TAXES**

Q. Would you please explain adjustment S-61.1?

A. Yes. This adjustment was made to annualize the FICA (social security), State Unemployment Taxes (SUTA) and Federal Unemployment Taxes (FUTA) associated with the Staff's payroll annualization at the current tax rates. The Staff's annualized payroll and the most current tax rate was used to calculate the level of payroll tax proposed in this case.

**INCENTIVE COMPENSATION AND BONUSES**

Q. Is the Staff proposing to eliminate MGE incentive compensation payouts that were tied to financial goals of the Company, commissions, performance and Christmas bonuses in this case?

A. Yes, adjustments S-12.2, S-13.2, S-14.2, S-16.2, S-17.2, S-18.2, S-19.2, S-20.2, S-21.3, S-23.2, S-24.2, S-25.2, S-27.2, S-28.2, S-29.2, S-30.2, S-31.2, S-32.2, S-33.2, S-34.2, S-35.2, S-39.2, S-43.3, S-46.2 and S-47.6 eliminate divisional incentive compensation payments tied to the Company's pre-tax earnings, commissions, performance and Christmas bonuses. These adjustments spread the effect of the Staff's proposed elimination of these amounts paid by the Company during the test year in accordance with the percentages the Company used to distribute bonus expense throughout its accounts.

Q. How is this financial goal is defined by the Company?

A. In the Company's response to Staff Data Request No. 81 that defines the payment of financial-based compensation for MGE:

> Divisional Goal: You will receive the following amount, if: 1) the Missouri Gas Energy Division achieves its goal of $65,609,227 in pre-tax earnings; and 2) the Division does not exceed its capital budget (normal operating budget excluding non-recurring items).

Q. Has the Commission previously expressed its policies concerning appropriate rate treatment of incentive compensation plans for MGE?

A. Yes. In the Report And Order issued in Case Nos. GR-96-285, et al., Missouri Gas Energy (MGE), the Commission stated:

> The Commission finds that the costs of MGE's incentive compensation program should not be included in MGE's revenue requirement because the incentive compensation program is driven at least primarily, if not solely, by the goal of shareholder wealth maximization, and it is not significantly driven by the interests of ratepayers (pages 36-37).

Q. Why did the Staff propose to eliminate performance bonuses paid during the test year?

A. The Staff contends that these payouts are based strictly on financial bench marks set forth by the Company. As with any bonus or incentive plan that is strictly tied to the stock price or other financial indicator, these payments should be excluded from the revenue requirement calculation.

Q. Why did the Staff propose to eliminate Christmas bonuses paid during the test year?

A. The Staff believes that Christmas bonuses are in the nature of gifts made to employees purely at the discretion of the Company, rather than a contractual obligation.

Q. Why did the Staff propose to eliminate commissions paid to employees during the test year?

A. The Staff has previously recommended that commissions be excluded from the revenue requirement calculation as they do not directly benefit the ratepayers.

**MATERIALS AND SUPPLIES /PREPAYMENTS**

Q. Please describe the Staff's treatment of materials and supplies, and prepayments.

A. Materials and supplies, and prepayments are represented in the Staff's rate base by thirteen (13)-month averages. Due to the cyclical nature of these two items, 13-month averages are developed to smooth out seasonal variations.

Q. What are materials and supplies?

A. Materials and supplies are miscellaneous items that are stored by the Company in inventory for use in day-to-day routine maintenance and operational projects. These items are also stored in inventory for the Company's construction projects.

Q. What are prepayments?

A. Prepayments relate to items that the Company "prepaid" so that the services will be on-hand during the normal course of the utility's operations. These types of items include the prepayment of insurance, software licenses, etc. that are paid in advance of coverage.

**CUSTOMER DEPOSITS**

Q. Please describe the customer deposits amount that is deducted from rate base.

A. Customer deposits generally represent funds received from customers as security against potential loss arising from failure to pay for service. The deposit represents a liability to repay the funds received after a specified period or upon satisfaction of certain requirements. Since customer deposits are, in effect, an interest-free loan to the Company, a representative level is included as an offset to the rate base investment. This treatment allows customers to receive a "return" on the customer deposit amounts maintained by the Company. The customer deposits computation is represented by a 13-month average. As with materials and supplies/prepayments, a 13-month average is used to smooth out cyclical variations in the account.

**INTEREST ON CUSTOMER DEPOSITS**

Q. Please explain adjustment S-57.1 for interest on customer deposits.

A. The Staff's adjustment annualizes interest expense related to customer deposits deducted from rate base. Customer deposits are interest bearing and the liability is deducted from rate base with the associated interest included as a cost of service. To calculate this adjustment, I used the current 5.0% interest rate for residential customers and the current 3.00% for commercial and industrial customers as set out in the Company's tariffs from Case No GR-2001-292.

**CUSTOMER ADVANCES**

Q. Please describe this item that is deducted from rate base.

A. The customer advances computations are represented by a 13-month average. Customer advances are funds provided by customers of the Company to assist in the costs of the provision of natural gas service. These funds, like customer deposits, represent interest-free money to the Company. Therefore, it is appropriate to include these funds as an offset to rate base. However, unlike customer deposits, no interest is paid to these customers for the use of the money.

**EMPLOYEE BENEFITS**

Q. Please explain the Staff's calculation for dental expense and adjustment S-52.8.

A. The Staff used the twelve months ending December 31, 2003, actual claims paid balance provided by the Company in response to the Staff's Data Request 280 this amount reflects the actual dental expense incurred by the Company for the period.

Q. Please explain adjustment S-52.3 to total 401(K) expense.

A. The Staff used the total annualized payroll levels for each employee and then applied the employer match rate and Shadow Plan match rate to each participant in the plan. The annualized amount was compared to the test year per book amount at June 30, 2003, to identify the related adjustment to the annualized level as of December 31, 2003.

Q. Please describe the Company's Shadow 401(k) plan.

A. According to the Company's response to Staff Data Request No. 234 in Case No. GR–2001-292, "The intent of this plan is to provide a supplemental savings and retirement benefit for certain key employees who may be adversely affected by the discrimination testing provisions in our Southern Union Savings Plan. Employees who are eligible to join the Shadow 401(k) Plan includes officers, and also those who have been in director positions one year or more at next entry date."

Q. What is the Retirement Power Plan?

A. Effective January 2, 1999 Southern Union Company began contributing retirement power contributions for non-union employees employed previous to January 1, 1999. The contributions to the Plan are a percentage of employee's compensation and range from 3.5% to 8.5% based on the sum of each individual's age plus years of service plus sick leave.

Q. Please explain adjustment S-52.6 for retirement power benefits.

A. This adjustment annualizes by each plan eligible employee the amount contributed by the Company on behalf of the employee.

Q. Please explain adjustment S-52.7 for Life, Accidental Death and Disability (AD&D) and Long Term Disability Insurance expense.

A. The Staff used the total annualized payroll levels for each employee and then applied the employer rates for each category of insurance to each participant in the plan. The annualized amounts were then compared to the test year per book amounts at June 30, 2003, to identify the related adjustment to the annualized level as of December 31, 2003.

Q. Does this conclude your direct testimony?

A. Yes, it does.

## CASE PROCEEDING PARTICIPATION

### DANA E. EAVES

| PARTICIPATION | | TESTIMONY |
|---|---|---|
| **COMPANY** | **CASE NO.** | **ISSUES** |
| Aquila, Inc. d/b/a Aquila Networks-MPS (Electric) | ER-2004-0034 | Direct - Payroll Expense, Employee Benefits, Payroll Taxes |
| Aquila, Inc. d/b/a Aquila Networks-L&P (Electric & Steam) | HR-2004-0024 | Direct - Payroll Expense, Employee Benefits, Payroll Taxes |
| Aquila, Inc. d/b/a Aquila Networks-MPS & L&P (Natural Gas) | GR-2004-0072 | Direct - Payroll Expense, Employee Benefits, Payroll Taxes |
| Osage Water Company | ST-2003-0562 WT-2003-0563 | Direct - Plant Adjustment, Operating & Maintenance Expense Adjustments |
| Empire District Electric Company, The | ER-2002-0424 | Direct - Cash Working Capital, Property Tax, Tree Trimming, Injuries and Damages, Outside Services, Misc. Adjustments |
| Citizens Electric Corporation | ER-2002-0297 | Direct - Depreciation Expense, Accumulated Depreciation, Customer Deposits, Material & Supplies, Prepayments, Property Tax, Plant in Service, Customer Advances in Aid of Construction |
| UtiliCorp United Inc, d/b/a Missouri Public Service | ER-2001-672 | Direct - Advertising, Customer Advances, Customer Deposits, Customer Deposit Interest Expense, Dues and Donations, Material and Supply, Prepayments, PSC Assessment, Rate Case Expense |