

Exhibit No.:
Issue(s): Energy Allocation Factors
Witness: Alan J. Bax
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: ER-2019-0374
Date Testimony Prepared: March 27, 2020

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

SURREBUTTAL TESTIMONY

OF

ALAN J. BAX

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2019-0374

Jefferson City, Missouri
March 2020

Surrebuttal Testimony of
Alan J. Bax

1 as well as the Wholesale jurisdiction, but neglect to annualize the retail energy kWhs for the
2 states of Kansas and Oklahoma without providing an explanation for this disparity.

3 Q. Would you agree with this assessment?

4 A. No.

5 Q. Please describe the calculation of EAFs that are illustrated in the Staff's
6 COS report.

7 A. On page 34 of Staff's COS Report, there are EAFs illustrated for three
8 jurisdictions: Missouri Retail, Non-Missouri Retail and Wholesale Operations. Non-Missouri
9 Retail Operations is comprised of the summation of the other states in which Empire provides
10 retail electric service other than Missouri (Kansas, Oklahoma and Arkansas). Wholesale
11 operations is a summation of Empire's current wholesale customers in the states of Missouri
12 and Kansas. As described in Staff's COS report, the EAF for each jurisdiction is the ratio of
13 the normalized annual kWh usage of a particular jurisdiction to the total normalized Empire
14 kWh usage. The kWh usage data has been adjusted for anticipated growth, annualizations and
15 non-normal weather. In Ms. Richard's Rebuttal Testimony, she describes these adjusted kWh
16 usage amounts as "annualized retail energy kWhs".

17 Q. Please explain Ms. Richard's contention that Staff annualized the kWhs of the
18 states of Missouri and Arkansas, but does not appear to have annualized Kansas and Oklahoma.

19 A. What Ms. Richard is describing as the annualized retail energy kWhs for the
20 state of Arkansas is actually the determination of Staff's Non-Missouri Retail EAF as illustrated
21 in the COS report.

22 Q. Does this conclude your surrebuttal testimony?

23 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Empire District Electric)
Company's Request for Authority to File) Case No. ER-2019-0374
Tariffs Increasing Rates for Electric Service)
Provided to Customers in its Missouri)
Service Area)

AFFIDAVIT OF ALAN J. BAX

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ALAN J. BAX and on their oath declares that they are of sound mind and lawful age; that they contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Alan J. Bax
ALAN J. BAX