

Exhibit No.: _____
Issue(s): Accounting Authority Order
Witness/Type of Exhibit: Robertson/Surrebuttal
Sponsoring Party: Public Counsel
Case No.: EU-2014-0255

SURREBUTTAL TESTIMONY

OF

TED ROBERTSON

Submitted on Behalf of the Office of the Public Counsel

KANSAS CITY POWER & LIGHT COMPANY

CASE NO. EU-2014-0255

December 10, 2014

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of)
Kansas City Power & Light Company)
for the Issuance of an Order)
Authorizing Construction Accounting)
Relating to its Electrical Operations)


Case No. EU-2014-0255

AFFIDAVIT OF TED ROBERTSON

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Ted Robertson, of lawful age and being first duly sworn, deposes and states:

1. My name is Ted Robertson. I am the Chief Public Utility Accountant for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal 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.




Ted Robertson, C.P.A.
Chief Public Utility Accountant

Subscribed and sworn to me this 10th day of December 2014.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

**SURREBUTTAL TESTIMONY
OF
TED ROBERTSON**

**KANSAS CITY POWER & LIGHT COMPANY
CASE NO. EU-2014-0255**

1 I. INTRODUCTION

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. Ted Robertson, PO Box 2230, Jefferson City, Missouri 65102-2230.

4
5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by the Missouri Office of the Public Counsel ("OPC" or "Public Counsel")
7 as the Chief Public Utility Accountant.

8
9 Q. WHAT IS THE NATURE OF YOUR CURRENT DUTIES AT THE OPC?

10 A. My duties include activities associated with the supervision of the regulatory accounting,
11 financial analysis, and economic operations of the OPC. I am also responsible for
12 performing audits and examinations of the books and records of public utilities operating
13 within the state of Missouri.

14
15 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND OTHER
16 QUALIFICATIONS.

17 A. I graduated in May, 1988, from Missouri State University in Springfield, Missouri, with a
18 Bachelor of Science Degree in Accounting. In November of 1988, I passed the Uniform

1 Certified Public Accountant ("CPA") Examination, and I obtained certification from the
2 state of Missouri in 1989. My CPA license number is 2004012798.

3
4 Q. HAVE YOU RECEIVED SPECIALIZED TRAINING RELATED TO PUBLIC UTILITY
5 ACCOUNTING?

6 A. Yes. In addition to being employed by the Missouri Office of the Public Counsel since
7 July 1990, I have attended the NARUC Annual Regulatory Studies Program at Michigan
8 State University, and I have also participated in numerous training seminars relating to
9 this specific area of accounting study.

10
11 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC SERVICE
12 COMMISSION ("COMMISSION" OR "MPSC")?

13 A. Yes, I have testified on numerous issues before this Commission. Please refer to
14 Schedule TJR-1, attached to this direct testimony, for a listing of cases in which I have
15 submitted testimony.

16
17 II. PURPOSE OF TESTIMONY

18 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

19 A. The purpose of this surrebuttal testimony is to respond to the rebuttal testimony of
20 MPSC witnesses, Mr. Keith Majors and Mr. Mark L. Oligschlaeger, regarding the Kansas
21 City Power & Light Company's ("KCP&L" or "Company") request that it be granted an
22 accounting authority order ("AAO") for certain incremental costs (i.e., carrying cost and
23 depreciation expense) associated with the construction of the environmental upgrades at

1 its LaCygne Generating Station ("La Cygne"). The costs in question would be those
2 expected to be incurred in the lag period between when the plant is placed in-service
3 and the operational law date of the Company's recently filed general rate increase case,
4 Case No. ER-2014-0370.

5
6 III. ACCOUNTING AUTHORITY ORDER

7 Q. DO YOU AGREE WITH THE RECOMMENDATIONS OFFERED BY THE MPSC STAFF
8 BEGINNING ON PAGE 50, LINE 21, THROUGH PAGE 51, LINE 4, OF MR. MAJORS
9 REBUTTAL TESTIMONY?

10 A. Yes, Public Counsel agrees with the MPSC Staff's recommendations concerning the
11 proper standards for authorization of an AAO, and that the Company's request for an
12 AAO be denied.

13
14 Q. WHAT IS YOUR UNDERSTANDING OF THE COMMISSION STANDARDS FOR
15 AUTHORIZING AN AAO DEFERRAL OF EXTRAORDINARY COSTS?

16 A. My understanding agrees with that of MPSC witness, Mr. Mark Oligschlaeger, as stated
17 in his rebuttal testimony beginning on page 5, line 16. In the Commission's Report and
18 Order, in Case Nos. EO-91-358 and EO-91-360 (often referred to as the Sibley case),
19 applications filed by Missouri Public Service, a division of UtiliCorp United, Inc. (now
20 KCP&L- GMO), the Commission expressed its position for deferral of costs that are
21 incurred outside of a rate case test year. In the Report and Order, pages 6-7, the
22 Commission stated:

1 The deferral of costs from one period to another period for the
2 development of a revenue requirement violates the traditional method of
3 setting rates... Under historical test year ratemaking, costs are rarely
4 considered from earlier than the test year to determine what is a
5 reasonable revenue requirement for the future. Deferral of costs from
6 one period to a subsequent rate case causes this consideration and
7 should be allowed only on a limited basis.
8

9 The Commission has consistently used the definition of the Federal Energy Regulatory
10 Commission ("FERC") Uniform System of Accounts ("USOA") General Instruction No. 7
11 in determining whether to grant an AAO to Missouri utilities. The complete definition of
12 the USOA General Instruction No. 7 for extraordinary items is as follows:
13

14 7. Extraordinary Items.
15

16 It is the intent that net income shall reflect all items of profit and loss
17 during the period with the exception of prior period adjustments as
18 described in paragraph 7.1 and long-term debt as described in paragraph
19 17 below. Those items related to the effects of events and transactions
20 which have occurred during the current period and which are of unusual
21 nature and infrequent occurrence shall be considered extraordinary items.
22 Accordingly, they will be events and transactions of significant effect
23 which are abnormal and significantly different from the ordinary and
24 typical activities of the company, and which would not reasonably be
25 expected to recur in the foreseeable future. (In determining significance,
26 items should be considered individually and not in the aggregate.
27 However, the effects of a series of related transactions arising from a
28 single specific and identifiable event or plan of action should be
29 considered in the aggregate. To be considered as extraordinary under the
30 above guidelines, an item should be more than approximately 5 percent
31 of income, computed before extraordinary items. Commission approval
32 must be obtained to treat an item of less than 5 percent, as extraordinary.
33 (See accounts 434 and 435.)

1 Q. WHAT IS THE PRIMARY PURPOSE OF AN AAO?

2 A. The primary purpose of an AAO is to allow utilities to seek authority from the
3 Commission to change the normal accounting treatment afforded to certain revenues,
4 expenses or rate base items as set forth under the Commission authorized USOA. That
5 is, AAOs provide a utility with the opportunity to seek rate recovery of certain types of
6 costs incurred prior to the rate case test year established in a rate case proceeding,
7 whereas normally, in the state of Missouri, only costs incurred within a rate case test
8 year or shortly thereafter are eligible for recovery in rates.

9
10 In almost all AAO applications, utilities seek permission to “defer” costs; that is, to
11 capitalize on their balance sheets costs that would normally be charged to expense on
12 the income statement by the utilities when incurred. From a regulatory accounting
13 perspective, the costs are entered in a special section of the balance sheet called
14 deferred debits. In this case, the specific account that the Company proposes to utilize
15 is Account 182.3, Other Regulatory Assets. If the Commission authorizes the deferral
16 and subsequently grants the utility rate recovery of the deferred amounts, the deferrals
17 will be amortized to expense on the income statement over a period of time, as opposed
18 to reflecting the entire cost in one accounting period.

19
20 Q. SHOULD THE COMMISSION AUTHORIZE THE USE OF AAOS BY UTILITIES WITH
21 MODERATION?

22 A. Yes. The Commission has, in the past, granted authority for utilities to defer costs in a
23 number of circumstances involving the occurrence of “extraordinary events” of various

1 types. However, AAOs should be used very sparingly because they permit ratemaking
2 consideration of items from outside a rate case test year. Generally, the deferral of
3 costs from one accounting period to another accounting period for the development of a
4 revenue requirement violates the traditional method of setting utility rates in the state of
5 Missouri.

6
7 Q. HOW ARE RATES USUALLY ESTABLISHED IN THE STATE OF MISSOURI?

8 A. In Missouri, rates are usually established based upon a historical test year which
9 focuses on four factors: (1) the rate of return that the utility has an opportunity to earn;
10 (2) the rate base upon which a return may be earned; (3) the depreciation expense
11 related to plant and equipment; and (4) the allowable operating expenses including
12 income and other taxes. The relationship among these four factors is such that the
13 expenses and the rate base necessary to produce the revenue requirement are
14 synchronized. The deferral of costs from a prior period results in costs associated with
15 the production of revenues in one period being charged against the revenues in a
16 different period. This violates the "matching principle" espoused by the Generally
17 Accepted Accounting Principles ("GAAP") and the Commission authorized USOA.

18
19 Also, it seems that utility companies in Missouri only seek extraordinary accounting
20 treatment for the impact of events expected to result in expenses or losses, not
21 revenues or gains. While the Commission has issued a number of AAOs over the years
22 for extraordinary costs, it appears no utility has requested the use of an AAO to defer
23 extraordinary over-earning of revenues. Because of this inherently biased application of

1 AAOs by Missouri utilities, the Commission should give great scrutiny to AAO requests
2 and apply strict tests that must be met prior to issuing an AAO.
3

4 Q. WHAT IS THE MATCHING PRINCIPLE?

5 A. The matching principal is a fundamental concept of accrual basis accounting that
6 revenues should be offset against expenses on the basis of their cause-and-effect
7 relationship. It states that, in measuring net income for an accounting period, the costs
8 incurred in that period should be matched against the revenue generated in the same
9 period. One of the basic accounting principles; it is followed to create a consistency in
10 the income statements, balance sheets, etc. That is, financial statements may be
11 greatly distorted if expenses are recognized earlier rather than later and vice versa;
12 jeopardizing the quality of the statements and providing an unfair representation of the
13 financial position of the business. For example:

- 14
- 15 • Recognizing an expense earlier than is appropriate lowers net income.
- 16 • Recognizing an expense later than appropriate raises net income.
- 17

18 The matching principle allows for a more objective analysis of profitability. By
19 recognizing costs in the period they are incurred, a business can see how much money
20 was spent to generate revenue, reducing possible confusion or misinformation from
21 timing mismatch between when costs are incurred and when revenue is realized.
22

1 Q. HOW DOES THE MPSC STAFF RECOMMEND THE COMMISSION TREAT KCP&L'S
2 APPLICATION?

3 A. Staff recommends that the Commission reject the Company's Application because it
4 does not meet the AAO standards for authorization.
5

6 Q. PLEASE RESPOND TO THE MPSC STAFF'S CONCLUSION.

7 A. Public Counsel also believes that the Company's request for an AAO is not appropriate
8 because it does not meet the Commission's standards for deferral authorization. The
9 estimated costs are not extraordinary, unusual and unique, or non-recurring.
10

11 Q. WHAT IS IT THAT KCP&L IS REQUESTING?

12 A. On June 12, 2014, KCP&L filed an application seeking an AAO authorizing construction
13 accounting treatment for the environmental project at the La Cygne Generating Station.
14 If granted, KCP&L would book certain construction expenses for improvements at La
15 Cygne as a regulatory asset for consideration in a future rate case. On page 1 of its
16 Application, the Company requests an accounting authority order with the following
17 language:
18

19 COMES NOW Kansas City Power & Light Company ("KCP&L" or the
20 "Company"), pursuant to Sections 386.2501 and 393.140 and 4 CSR 240-
21 2.060, and hereby applies for the issuance of an order that would allow
22 KCP&L to treat the La Cygne environmental project under "Construction
23 Accounting", as more fully described herein, until the effective date of the
24 rates approved in KCP&L's rate case in which the La Cygne
25 environmental project is included in rates.
26
27

1 And, continuing,
2
3

4 7. By this Application, KCP&L seeks authorization from the
5 Commission to undertake certain accounting procedures in connection
6 with its La Cygne environmental project. The La Cygne environmental
7 project consists of installation of wet scrubbers, bag houses and a
8 common dual-flue chimney for both La Cygne Units 1 and 2, and a
9 selective catalytic reduction ("SCR") system, low-nitrogen oxide ("NOx")
10 burners ("LNBs"), and an over-fire air ("OFA") system for La Cygne Unit 2.
11 The La Cygne environmental project is necessary for KCP&L to comply
12 with environmental regulations. The Company reached an agreement
13 with the Kansas Department of Health and Environment ("KDHE") which
14 ultimately became a part of the Kansas Regional Haze Rule State
15 Implementation Plan submitted by KDHE to the Environmental Protection
16 Agency ("EPA") for approval. As a result of that agreement with
17 environmental regulators, KCP&L must have in place best available
18 retrofit technology ("BART") environmental equipment on La Cygne Units
19 1 and 2 on or before June 1, 2015 or the units will not be in compliance
20 and will be shut down until the equipment is installed and in-service.
21

22 8. Specifically, KCP&L is requesting approval for the use of
23 Construction Accounting associated with its La Cygne plant addition.
24 Construction Accounting would include the deferral of Missouri
25 jurisdictional carrying costs calculated on the La Cygne plant addition
26 from the time the La Cygne plant investment is placed in service until the
27 date rates become effective in the Company's next general rate case. In
28 addition, all Missouri jurisdiction monthly depreciation expense on the La
29 Cygne environmental project from the date the La Cygne plant addition is
30 placed in service until the date rates become effective in the Company's
31 next general rate case.
32
33

34 Q. IS KCP&L'S REQUEST FURTHER EXPLAINED IN THE TESTIMONY OF A COMPANY
35 WITNESS?

36 A. Yes. Beginning on page 7, line 6, of the Direct Testimony of Company witness, Mr.
37 Ronald A. Klote, he states:
38
39

1 Q: How would you define Construction Accounting as it relates to
2 your current request?
3

4 A: The authorization of Construction Accounting in this proceeding
5 can be best described by separating it into two separate buckets
6 of deferrals that will be recorded in Regulatory Asset Account
7 182.3. First, Construction Accounting would provide for a deferral
8 mechanism to record to Regulatory Asset Account 182.3 the
9 Missouri jurisdictional carrying costs calculated on the La Cygne
10 environmental plant addition from the date the plant addition is
11 placed in service to the date the plant addition is included in rates.
12 Secondly, Construction Accounting would provide for a deferral
13 mechanism to record to Regulatory Asset Account 182.3 the
14 Missouri jurisdictional monthly depreciation expense recorded for
15 the La Cygne environmental plant addition from the date the
16 project is placed in service to the date the plant addition is
17 included in rates. Both of these amounts would be accumulated in
18 Regulatory Asset Account 182.3 and treatment of these costs
19 would be decided in the Company's next general rate case.
20
21

22 Q. WHY DOES THE COMPANY BELIEVE THAT THE AAO IS NEEDED?

23 A. Beginning on page 6, line 1, of Mr. Klote's Direct Testimony, he states:
24

25 Q: What is different about the La Cygne environmental plant addition
26 compared to other more typical plant additions that justifies the
27 use of Construction Accounting in this instance?
28

29 A: Quite simply, the magnitude of the La Cygne environmental plant
30 addition distinguishes this project from more typical plant
31 additions. The KCP&L-MO share of the La Cygne environmental
32 project amounts to approximately \$336 million in rate base prior to
33 the impacts of AFUDC. For context, this amounts to approximately
34 16% of Missouri jurisdictional rate base used to set rates in
35 KCP&L's most recent general rate proceeding in Missouri. It
36 should also be noted that the La Cygne environmental project 1)
37 will not provide access to new customers or new revenue streams
38 that could be used to help defray the costs associated with the
39 project and 2) is necessary to meet governmentally mandated
40 environmental standards. This construction project includes
41 installation of wet scrubbers, bag houses, and a dual flue chimney

1 for both Units 1 and 2, and a selective catalytic reduction ("SCR"),
2 low-nitrogen oxide ("low NOx") burners, and an over-fire air
3 ("OFA") system for Unit 2. This is a very significant investment in
4 environmental equipment that is impactful on the earnings of the
5 Company. Any gap between the date the investment goes into
6 service and the date the investment is collected in rates will create
7 significant regulatory lag on the Company's earnings.
8

9 Q: Discuss the financial impact of the lag.

10
11 A: Absent the use of construction accounting treatment, when the La
12 Cygne environmental project goes in-service, KCP&L estimates
13 that carrying costs and depreciation expense associated with the
14 La Cygne environmental project will reduce KCP&L's earnings by
15 approximately \$1.8 million per month until new rates which include
16 the cost of the La Cygne environmental project take effect. While
17 this negative earnings impact is significant in and of itself, this
18 impact will be amplified by the fact that when the La Cygne
19 environmental project goes in-service, KCP&L will have a general
20 rate case on file and already be in an earnings-deficient situation.
21 Use of construction accounting, however, would ease this financial
22 situation somewhat. (Emphasis added)
23
24

25 Q. ARE THE COSTS COMPANY SEEKS TO DEFER EXTRAORDINARY?

26 A. No. The construction costs in question are not abnormal or significantly different from
27 the ordinary and typical activities of the company, nor are they unpredictable. They have
28 not and will not occur unexpectedly. The Company has been incurring carrying costs
29 (i.e. AFUDC) for as long as the construction-related activities at the La Cygne
30 Generating Station have occurred. While depreciation expense which has not yet begun
31 to accrue, in accordance with GAAP, it will commence after the plant is placed in-
32 service.

1 Q. ARE THE COSTS AT ISSUE OUTSIDE THE CONTROL OF COMPANY'S
2 MANAGEMENT?

3 A. No. The planning and construction processes in relation to this project has been known
4 for some time and are, apparently, directly linked with the actions of the Company's
5 management and its negotiations with regulators in the state of Kansas. If the Company
6 had wanted to further mitigate the potential for earnings reduction attributed to regulatory
7 lag, it could or should have timed the in-service date of the construction closer to the
8 operational law date of its filed Missouri general rate increase case or filed the Missouri
9 case sooner. It is likely that neither action was outside of the Company's control.
10

11 Q. ARE THE COSTS IN QUESTION UNUSUAL AND UNIQUE?

12 A. No. For a cost to be considered as unusual and unique, the cost must be abnormal and
13 significantly different from the ordinary and typical activities of a utility. KCP&L has been
14 involved in large construction projects on a continuing basis for several years. That is, in
15 any given year the Company will undertake capital projects which either improve or
16 increase its rate base. The occurrence of these types of costs is not an unusual activity,
17 but is instead a primary on-going activity of the regulated electric utilities operating in the
18 state of Missouri. In his direct testimony, Mr. Klote provides no support that would lead
19 the Commission to believe that the costs associated with the La Cygne construction are
20 unusual and/or unique from similar prior construction activities.
21

22 Q. HOW DOES MR. KLOTE DIFFERENTIATE THE LA CYGNE CONSTRUCTION FROM
23 OTHER CONSTRUCTION ACTIVITIES?

1 A. On page 6, lines 4-5, of his direct testimony, he states that, "... the magnitude of the La
2 Cygne environmental plant addition distinguishes this project from more typical plant
3 additions," but what he describes in his direct testimony as the actual driving force for
4 the AAO request is that a period of regulatory lag will occur which will have a detrimental
5 impact on the Company's earnings. On page 5, lines 15-18, of his direct testimony, he
6 states:

7
8 In the case of the La Cygne environmental project, KCP&L estimates that
9 the period of time between the in-service date and the commencement of
10 rate recovery will be no less than four (4) months which is very significant
11 and would have a detrimental impact on the Company's earnings.
12 (Emphasis added)
13
14

15 KCP&L recognizes that the La Cygne project is a normal plant addition, but that it differs
16 from other normal plant additions only in its magnitude and the timing of its in-service
17 date. The Company's only justification as to why it is seeking to defer future costs
18 associated with the construction is because of the potential detrimental impact to its
19 earnings caused by regulatory lag. It does not provide any support that the construction
20 is an abnormal or significantly different activity from the ordinary and typical construction
21 activities it normally incurs and again, the regulatory lag is of KCP&L's own making – the
22 Company controls the timing of its rate case.
23

24 Q. PLEASE EXPLAIN THE CONCEPT OF REGULATORY LAG.

25 A. This concept is based on a difference in the timing of a decision by management and the
26 Commission's recognition of that decision and its effect on the rate base rate of return

1 relationship in the determination of a company's revenue requirement. Management
2 decisions that reduce or increase the cost of service without changing revenues result in a
3 change in the rate base/rate of return relationship. This change either increases or
4 decreases the profitability of the Company in the short-run until such time as the
5 Commission re-establishes rates to properly match revenues with the new level of service
6 cost. Companies are allowed to retain cost savings (i.e., excess profits during the lag
7 period between rate cases) and are required to absorb cost increases. When faced with
8 escalating costs regulatory lag places pressure on management to minimize the change in
9 the relationship because it cannot be recognized in a rate increase until the Commission
10 approves such in a general rate proceeding.

11
12 Q. HAS THIS COMMISSION RULED THAT IT IS NOT REASONABLE TO PROVIDE
13 PROTECTION FROM REGULATORY LAG TO SHAREHOLDERS?

14 A. Yes, it has. In Missouri Public Service Co., Case Nos. EO-91-358 & EO-91-360, the
15 Commission stated:

16
17 Lessening the effect of regulatory lag by deferring costs is beneficial to a
18 company but not particularly beneficial to ratepayers. Companies do not
19 propose to defer profits to subsequent rate cases to lessen the effects of
20 regulatory lag, but insist it is a benefit to defer costs. Regulatory lag is a part
21 of the regulatory process and can be a benefit as well as a detriment.
22 Lessening regulatory lag by deferring costs is not a reasonable goal unless
23 the costs are associated with an extraordinary event.

24
25 Maintaining the financial integrity of a utility is also a reasonable goal. The
26 deferral of costs to maintain current financial integrity, though, is of
27 questionable benefit. If a utility's financial integrity is threatened by high
28 costs so that its ability to provide service is threatened, then it should seek
29 interim rate relief. If maintaining financial integrity means sustaining a

specific return on equity, this is not the purpose of regulation. It is not reasonable to defer costs to insulate shareholders from any risks. 1 Mo. P.S.C. 3d 200, 207 (1991).

Here KCP&L has sought to defer costs normally associated with construction activities on the basis that they will have a detrimental impact on the Company's earnings. To grant the relief requested by the Company would relieve its shareholders from the associated risk.

Q. ARE THE COSTS IN QUESTION NON-RECURRING?

A. No. For a cost to be considered non-recurring, the cost must be a one-time expense that is unlikely to recur in the foreseeable future. Mr. Klote admits that the La Cygne project is a plant addition construction project that only differs from other plant addition construction projects in its magnitude. Construction costs are a normal part of Company's ongoing operations. Construction, whether large or small and whether for environmental compliance or not, is on a historical and going-forward basis a recurring event at KCPL.

Q. PLEASE SUMMARIZE THE PUBLIC COUNSEL'S POSITION.

A. It is the Public Counsel's belief that the construction-related costs which the Company seeks to defer do not satisfy any of the AAO standards for authorization utilized by the Commission. They are not extraordinary, unusual or unique, and they are recurring. What the Company is actually seeking is relief from the effects of possible regulatory lag that would occur should the plant under construction be placed in-service prior to the

Surrebuttal Testimony of Ted Robertson
Case No. EU-2014-0255

1 effective date of rates in its current general rate increase case, Case No. ER-2014-0370.
2 Public Counsel recommends that the Commission deny the Company's request for the
3 AAO because the AAO standards have not been met, and though no ratemaking is likely
4 to occur in the instant case, it is not reasonable to defer the costs at issue merely to
5 postpone a decision that would, if recovery from ratepayers were later authorized, only
6 exist to insulate shareholders from potential earnings risk.
7

8 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

9 A. Yes.

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
Missouri Public Service Company	GR-90-198
United Telephone Company of Missouri	TR-90-273
Choctaw Telephone Company	TR-91-86
Missouri Cities Water Company	WR-91-172
United Cities Gas Company	GR-91-249
St. Louis County Water Company	WR-91-361
Missouri Cities Water Company	WR-92-207
Imperial Utility Corporation	SR-92-290
Expanded Calling Scopes	TO-92-306
United Cities Gas Company	GR-93-47
Missouri Public Service Company	GR-93-172
Southwestern Bell Telephone Company	TO-93-192
Missouri-American Water Company	WR-93-212
Southwestern Bell Telephone Company	TC-93-224
Imperial Utility Corporation	SR-94-16
St. Joseph Light & Power Company	ER-94-163
Raytown Water Company	WR-94-211
Capital City Water Company	WR-94-297
Raytown Water Company	WR-94-300
St. Louis County Water Company	WR-95-145
United Cities Gas Company	GR-95-160
Missouri-American Water Company	WR-95-205
Laclede Gas Company	GR-96-193
Imperial Utility Corporation	SC-96-427
Missouri Gas Energy	GR-96-285
Union Electric Company	EO-96-14
Union Electric Company	EM-96-149
Missouri-American Water Company	WR-97-237
St. Louis County Water Company	WR-97-382
Union Electric Company	GR-97-393
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GR-98-374
United Water Missouri Inc.	WR-99-326
Laclede Gas Company	GR-99-315
Missouri Gas Energy	GO-99-258
Missouri-American Water Company	WM-2000-222
Atmos Energy Corporation	WM-2000-312
UtiliCorp/St. Joseph Merger	EM-2000-292
UtiliCorp/Empire Merger	EM-2000-369
Union Electric Company	GR-2000-512
St. Louis County Water Company	WR-2000-844
Missouri Gas Energy	GR-2001-292

Schedule TJR-1.1

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
UtiliCorp United, Inc.	ER-2001-672
Union Electric Company	EC-2002-1
Empire District Electric Company	ER-2002-424
Missouri Gas Energy	GM-2003-0238
Aquila Inc.	EF-2003-0465
Aquila Inc.	ER-2004-0034
Empire District Electric Company	ER-2004-0570
Aquila Inc.	EO-2005-0156
Aquila, Inc.	ER-2005-0436
Hickory Hills Water & Sewer Company	WR-2006-0250
Empire District Electric Company	ER-2006-0315
Central Jefferson County Utilities	WC-2007-0038
Missouri Gas Energy	GR-2006-0422
Central Jefferson County Utilities	SO-2007-0071
Aquila, Inc.	ER-2007-0004
Laclede Gas Company	GR-2007-0208
Kansas City Power & Light Company	ER-2007-0291
Missouri Gas Utility, Inc.	GR-2008-0060
Empire District Electric Company	ER-2008-0093
Missouri Gas Energy	GU-2007-0480
Stoddard County Sewer Company	SO-2008-0289
Missouri-American Water Company	WR-2008-0311
Union Electric Company	ER-2008-0318
Aquila, Inc., d/b/a KCPL GMOC	ER-2009-0090
Missouri Gas Energy	GR-2009-0355
Empire District Gas Company	GR-2009-0434
Lake Region Water & Sewer Company	SR-2010-0110
Lake Region Water & Sewer Company	WR-2010-0111
Missouri-American Water Company	WR-2010-0131
Kansas City Power & Light Company	ER-2010-0355
Kansas City Power & Light Company	ER-2010-0356
Timber Creek Sewer Company	SR-2010-0320
Empire District Electric Company	ER-2011-0004
Union Electric Company, d/b/a AmerenUE	ER-2011-0028
Missouri-American Water Company	WR-2011-0337
Union Electric Company, d/b/a AmerenMO	EU-2012-0027
Missouri-American Water Company	WA-2012-0066
Union Electric Company, d/b/a AmerenMO	ER-2012-0166
Laclede Gas Company	GO-2012-0363
Kansas City Power & Light Company	ER-2012-0174
Kansas City Power & Light Company GMOC	ER-2012-0175
Empire District Electric Company	ER-2012-0345

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
Emerald Pointe Utility Company, Inc.	SR-2013-0016
Liberty Utilities	GO-2014-0006
Lincoln County Sewer & Water, LLC	SR-2013-0321
Lincoln County Sewer & Water, LLC	WR-2013-0322
Lake Region Water & Sewer Company	WR-2013-0461
Missouri Gas Energy	GR-2014-0007
Peaceful Valley Service Company	SR-2014-0153
Peaceful Valley Service Company	WR-2014-0154
Hillcrest Utility Operating Company, Inc.	WO-2014-0340
Union Electric Company, d/b/a AmerenMO	ER-2014-0258
Kansas City Power & Light Company	EU-2014-0255

