

**Exhibit No.:** \_\_\_\_\_  
**Issue(s):** Riverton 12 Long-Term Maintenance  
Contract Tracker (LTM)  
**Witness/Type of Exhibit:** Roth/Rebuttal  
**Sponsoring Party:** Public Counsel  
**Case No.:** ER-2016-0023

**REBUTTAL TESTIMONY**

**OF**

**KERI ROTH**

Submitted on Behalf of the Office of the Public Counsel

**EMPIRE DISTRICT ELECTRIC COMPANY**

CASE NO. ER-2016-0023

May 2, 2016

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

In the Matter of The Empire District )  
Electric Company's Request for )  
Authority to Implement a General ) Case No. ER-2016-0023  
Rate Increase for Electric Service )

**AFFIDAVIT OF KERI ROTH**

STATE OF MISSOURI )  
 ) ss  
COUNTY OF COLE )

Keri Roth, of lawful age and being first duly sworn, deposes and states:

1. My name is Keri Roth. I am a Public Utility Accountant III for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal 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.

*Keri Roth*  
\_\_\_\_\_  
Keri Roth  
Public Utility Accountant III

Subscribed and sworn to me this 27<sup>th</sup> day of April 2016.



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

*Jerene A. Buckman*  
\_\_\_\_\_  
Jerene A. Buckman  
Notary Public

My Commission expires August, 2017.

**REBUTTAL TESTIMONY**  
**OF**  
**KERI ROTH**  
**EMPIRE DISTRICT ELECTRIC COMPANY**  
**CASE NO. ER-2016-0023**

1 **I. INTRODUCTION**

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

3 A. Keri Roth, P.O. Box 2230, Jefferson City, Missouri 65102-2230.

4 **Q. Are you the same Keri Roth who has filed direct testimony in this case?**

5 A. Yes.

6 **Q. What is the purpose of your rebuttal testimony?**

7 A. The purpose of this rebuttal testimony is to respond to direct testimony from Empire District  
8 Electric Company (“Empire”) regarding the Riverton 12 long-term maintenance contract  
9 tracker (“LTM”).

10

11 **II. RIVERTON 12 LONG-TERM MAINTENANCE CONTRACT**  
12 **TRACKER**

13 **Q. Is Empire requesting additional changes to the Riverton 12 LTM?**

14 A. Yes. On page 6 of Mr. John M. Woods’ testimony, he suggests setting up a tracker for all  
15 non-labor operations and maintenance expense costs (“O & M”) for the Riverton 12  
16 Combined Cycle Unit.

17 **Q. What do non-labor O & M expenses include usually?**

1 A. Non-labor O & M expenses may include, but not be limited to, maintenance of electric  
2 control system, turbines, generators, and safety expenditures. My basis for this derives from  
3 my understanding of utility operations from an accountancy perspective only. I do not  
4 purport to explain this from any perspective of an engineer or other technical expert.

5 **Q. Does OPC support the Riverton 12 LTM tracker?**

6 A. Yes. This is discussed in my direct testimony on page 15, lines 20 – 21.

7 **Q. Has OPC determined which non-labor O & M accounts should be tracked under the**  
8 **tracker?**

9 A. No. It is OPC's understanding, based on discussion during the technical conference held on  
10 April 19 of this year, Empire will provide a list of non-labor O & M accounts to OPC and  
11 the Missouri Public Service Commission Staff they wish to include in the tracker. OPC will  
12 review the list of accounts and provide a recommendation in surrebuttal.

13 **Q. Does this conclude your rebuttal testimony?**

14 A. Yes.