Exhibit No.:

Issues: Maintenance Contract

Witness: David W. Elliott

Sponsoring Party: MoPSC

Type of Exhibit: Rebuttal Testimony

Case No.: ER-2001-299

Date Testimony Prepared: May 3, 2001

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## MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

## **REBUTTAL TESTIMONY**

**OF** 

DAVID W. ELLIOTT

THE EMPIRE DISTRICT ELECTRIC COMPANY

CASE NO. ER-2001-299

Jefferson City, Missouri May, 2001

1 **REBUTTAL TESTIMONY** 2 **OF** 3 DAVID W. ELLIOTT THE EMPIRE DISTRICT ELECTRIC COMPANY 4 CASE NO. ER-2001-299 5 6 7 Q. Please state your name. 8 A. David W. Elliott. 9 Are you the same David W. Elliott who has previously filed direct Q. 10 testimony in this case? 11 A. Yes, I am. What is the purpose of your rebuttal testimony? 12 Q. 13 The purpose of my rebuttal testimony is to respond to the direct testimony A. 14 of Empire witness Gary L. Groninger regarding a contract for maintenance at the State 15 Line Combined Cycle Unit, and State Line Unit No. 1. 16 Q. Did you review the direct testimony of Mr. Gary L. Groninger? 17 A. Yes. 18 Does his direct testimony include an analysis of the costs savings for a Q. 19 long-term maintenance contract for the State Line Combined Cycle Unit, and State Line 20 Unit No. 1? 21 A. Yes; however, Staff was informed that the contract had not yet been 22 executed. Has Empire updated Staff on the status of the maintenance contract? 23 Q.

## Rebuttal Testimony of David W. Elliott

1	<b>A</b> .	Staff has been informed by Empire that there are now two contracts under
2	consideration.	One contract is for maintenance of the State Line Combined Cycle Unit,
3	and the other i	s for maintenance of State Line Unit No. 1 and Energy Center Units Nos. 1
4	and 2.	
5	Q.	Did Empire indicate when it expected these contracts would be executed?
6	Α.	No.
7	Q.	If the contracts have been executed and provided to the Staff in time for
8	the Staff to review them before the true-up filings, will the Staff consider these contracts	
9	as a basis for maintenance expenses in the context of this rate case?	
10	A.	Yes.
11	Q.	Will the Staff automatically include this level of maintenance expense if it
12	receives the contracts and supporting documentation prior to the true-up hearings?	
13	A.	No. Staff will first review the contracts, including all supporting
14	documentation and economic analyses performed by the Company, to determine if the	
15	actual costs	associated with the contracts are cost effective relative to paying for
16	maintenance as it occurs.	
17	Q.	Does this conclude your rebuttal testimony?
18	A.	Yes, it does.

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

IN THE MATTER OF THE APPLICATION OF THE EMPIRE DISTRICT ELECTRIC COMPANY FOR A GENERAL RATE INCREASE	) ) Case No. ER-2001-299 )		
AFFIDAVIT O	F DAVID ELLIOTT		
STATE OF MISSOURI )			
COUNTY OF COLE ) ss			
David Elliott, of lawful age, on his oath states: that he has participated in the preparation of the foregoing written testimony in question and answer form, consisting of pages of testimony to be presented in the above case, that the answers in the attached written testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.			
	David Elliott		
Subscribed and sworn to before me this	day of May, 2001.		
DAWN L. H.  Notary Public State  My commission expires County of County o	Notary Public		