

## Missouri Public Service Commission

### Respond Data Request

<b>Data Request No.</b>	0354
<b>Company Name</b>	MO PSC Staff-(All)
<b>Case/Tracking No.</b>	ER-2019-0374
<b>Date Requested</b>	4/6/2020
<b>Issue</b>	Rate of Return - Capital Structure
<b>Requested From</b>	Peter Chari
<b>Requested By</b>	David Murray
<b>Brief Description</b>	If Mr. Chari knew LUCo used the \$395 million of off-balance-sheet debt financing for investment
<b>Description</b>	3059. Please confirm or deny whether Staff witness Mr. Chari stated or agreed to the following at the March 18, 2019, technical conference in this case: If Mr. Chari knew LUCo used the \$395 million of off-balance-sheet debt financing for investment in LUCo's regulated utilities, he would adjust LUCo's capital structure to reflect such for purposes of determining whether Empire's or LUCo's capital structure is more economical.
<b>Response</b>	Response Yes, Staff stated that at the informal technical conference. However, Staff has changed its position on this issue since that conference. Data Request Response provided by Peter Chari (Peter.Chari@psc.mo.gov).
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **ER-2019-0374** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security :</b>	Public
<b>Rationale :</b>	NA