Missouri Public Service Commission

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August 24, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. ER-2001-672 -- In the matter of the Tariff Filing of Missouri Public Service (MPS), a Division of UtiliCorp United, Inc., to Implement a General Rate Increase for Retail Electric Service Provided to Customers in the Missouri Service Area of MPS

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **ADDITIONAL STAFF RESPONSE.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Steven Dottheim
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SD:ccl
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

AUG 2 4 2001

Missouri Public
Service Commission

In the matter of the Tariff Filing of Missouri Public Service (MPS), a Division of UtiliCorp United, Inc., to Implement a General Rate Increase for Retail Electric Service Provided to Customers in the Missouri Service Area of MPS.	))))))	Case No. ER-2001-672

ADDITIONAL STAFF RESPONSE

Comes now the Staff of the Missouri Public Service Commission (Staff) in response to the August 15, 2001 Order of the Missouri Public Service Commission (Commission) and submits this Additional Staff Response:

1. At oral argument on August 14, 2001, counsel for Jackson County noted Section 393.130.3 RSMo. 2000:

> *No* gas corporation, *electrical corporation*, water corporation or sewer corporation *shall make or grant any undue or unreasonable preference or advantage to any* person, corporation or *locality*, or to any particular description of service *in any respect whatsoever, or subject any particular* person, corporation or *locality* or any particular description of service *to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.*

(Emphasis supplied). A search for court cases dealing with the making or granting of an undue or unreasonable preference or advantage to any locality, or subjecting any particular locality to an undue or unreasonable prejudice or disadvantage revealed only one case addressing this language, *State ex rel. McKittrick v. Public Serv. Comm'n*, 175 S.W.2d 857 (Mo.banc 1943) (hereinafter referred to as *McKittrick*), although there are court cases that address other language of Section 393.130.3 (*State ex rel. Office of Public Counsel v. Public Serv. Comm'n*, 782 S.W.2d

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822 (Mo.App. 1990) and *State ex rel. Marco Sales, Inc. v. Public Serv. Comm'n*, 685 S.W.2d 216 (1984)). To date, *McKittrick* has not been cited by any party to this proceeding.

In that case, the Attorney General McKittrick sought review of a Commission order sustaining a joint application of Laclede Power & Light Company (LPL) and others to sell to Union Electric Company (UE) the property rights and franchises of LPL. The rates charged by LPL on some classes of service were lower than those charged by UE. The Court explained that upon authorization of the transaction, UE would supply the LPL customers from its own generating sources, "[b]ut complete integration of the two properties could not be effected for an indefinite time, depending largely upon the availability of required materials and manpower, and economic conditions." 175 S.W.2d at 858-59.

The Commission approved the application for the following reasons: (1) the merger would benefit the public because it would eliminate wasteful competition by the integration of two public utilities; (2) it would provide an opportunity for reducing the cost of electric service by eliminating duplicate facilities and organizations; (3) it would promote public safety by relieving congestion on public trafficways through the removal of duplicate distribution facilities; (4) it would improve the financial stability of the system, since LPL was not as financially stable as UE; and (5) it would provide better assurance of uninterrupted service to LPL's present customers since UE's system had large and more diversified facilities for service. 175 S.W.2d at 859.

The Commission directed that the rates of LPL in effect at the time of the transaction should be continued in effect by UE to the customers of LPL who elected to continue to receive service at the same premises through facilities acquired from LPL and under the same conditions of service, unless and until such rates be cancelled or changed by order of the

Commission after notice and opportunity for hearing. The Attorney General charged that the Commission's Order permitting UE to continue its own rates and the separate lesser rates of LPL authorized special, discriminatory lesser rates to LPL's customers in violation of Section 5645(2) and (3) RSMo. 1939 (now Section 393.130.2 and .3 RSMo. 2000) and in that the question of rates was in the merger case, this question should have been decided by the Commission and the cause should be remanded to the Commission for that purpose. 175 S.W.2d at 859, 865.

The Missouri Supreme Court upheld the Commission stating that the unification of the two systems had not been accomplished and that until then, the Commission would be justified, in its reasonable discretion, in treating the two systems as separate units for rate purposes:

> . . . [The Attorney General] assumes the service rendered by the Laclede [352 Mo. 44] Electric and the Union Electric is the same, notwithstanding the greater assurance of uninterrupted and efficient service which the customers of the latter company enjoy because of its superior position in equipment and financing--as found by the Commission; and ignores the fact that there is as yet no intelligent basis for fixing a common rate. Until the unification of the two systems is accomplished or the effect thereof is reasonably discernible, we think and hold the Commission in its reasonable discretion is justified in treating the two systems as separate units for rate purposes, notwithstanding the ownership and control of both have come into the same hands. This disposes of the other kindred assignments that the question of rates is involved; and that the cause should be remanded to receive evidence thereon.

175 S.W.2d at 866. The applicability of *McKittrick* to this case is most clearly to the continuation of separate rates for the MPS and SJLP divisions of UtiliCorp.

The Staff suggests that the Commission would have a very strong basis for leaving SJLP's rates separate from MPS's rates because of the "not detrimental to the public" standard respecting mergers. SJLP rates prior to the merger were lower than MPS's rates and they still are. To the extent that UtiliCorp would raise SJLP's rates just to increase them to MPS's level or to average MPS's and SJLP's rates in some manner, such an increase in SJLP's

rates would be detrimental to SJLP's ratepayers. The Commission would have very strong basis for maintaining separate rate structures for MPS and SJLP so as to prevent the merger from being even more detrimental to the public.

In Case No. ER-2001-672, UtiliCorp filed direct testimony along with MPS tariffs on June 8, 2001 stating that the merger of UtiliCorp and SJLP has not been fully effectuated. Although at page 3 of his direct testimony, Gary L. Clemens states that "[t]he process of merging the two companies will take up to a year to complete," the merger will not be completely effectuated by January 1, 2002. Mr. Clemens notes at page 4 of his direct testimony that "Vern Siemek has filed direct testimony in this case which includes his synergy estimates as provided in the UtiliCorp and SJLP merger Case No. EM-2000-292." Schedule VJS-A to Mr. Siemek's direct testimony filed on June 8, 2001 in Case No. ER-2001-672 is Mr. Siemek's direct testimony in Case No. EM-2000-292. Mr. Siemek states at page 3 of Schedule VJS-A, his direct testimony in Case No. EM-2000-292 that "Schedule VJS-3 provides a summary of merger synergies for SJLP for several detailed areas in constant dollars. Most of these synergies remain at a constant level in 1999 dollars after 2003 once they have been fully implemented. . . ." At page 17 of Schedule VJS-A, his direct testimony in Case No. ER-2000-292 as corrected by his Errata Sheet for that testimony, the following question and answer appear, in part:

> Q. Please summarize the synergies projected by the Distribution transition team review.
>
> A. The team estimated that operating cost synergies of $1,780,000 *could ultimately be achieved by 2003*, with another $168,000 per year in capital savings ultimately realizable. . . . .

(Emphasis supplied).

MPS and SJLP are not integrated[1] in another respect: the SJLP – MPS Electric Allocations Agreement. This agreement is akin to the Joint Dispatch Agreement (JDA) in the Union Electric Company – CIPSCO, Inc. merger, Case No. EM-96-149, and the Conceptual Framework For A Generation And Transmission Costs Allocations Agreement in the aborted Western Resources, Inc. (Western Resources) – Kansas City Power & Light Company (KCPL) merger, Case No. EM-97-515. In Case No. EM-2000-292, Staff witness Michael S. Proctor characterized in his rebuttal testimony, Exhibit 714 at pages 23-24, the MPS – SJLP Electric Allocations Agreement as a joint dispatch agreement and described such an agreement as assigning to the separate merging entities the costs of their former generating units and purchased power contracts, which is important if the merged entity wants to continue separate rates for each division:

> A joint dispatch agreement specifies how the generation and long-term power contracts of the separate companies or divisions will be used to meet the overall native load requirements. Native load includes both retail loads served under State Commission tariffs and wholesale loads that are either under contract or are served on a Federal Regulatory Commission (FERC) tariff. This is the load that the utilities are obligated to serve with their power supply resources.
>
> *In addition to specifying how power supply resources will be used, the joint dispatch agreement specifies how the costs resulting from the use of these resources will be allocated among the various divisions; e.g., MPS and SJLP. This is important if the merged entity intends to continue separate rates for each division and yet treat power supply as a common cost through jointly dispatching the separate power supply resources.* It should be noted that there are other divisions of UCU, such as West Plains, that are not included in the joint dispatch agreement.

(Emphasis supplied).

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[1] The FERC's June 4, 2001 Order Accepting Compliance Filing and Authorizing Integrated Operations in Docket No. EC00-27-003, 95 FERC para. 61,345, states that the operations of MPS and SJLP will be integrated through a 161 kV transmission line owned by KCPL, which will be upgraded by January 1, 2003 and leased from KCPL, and in the interim the MPS and SJLP systems will be integrated using a 150 MW bi-directional firm contract path.

In Case No. EM-2000-292, UtiliCorp witness Frank A. DeBacker adopted the direct testimony of Robert W. Holzwarth, Exhibit 14, which states at page 18 that UtiliCorp was utilizing a synergy, i.e., savings, sharing plan based on the allocations agreement proposed by Staff witness James C. Watkins in Commission Case No. EM-97-515:

> Q. How do the Joint Applicants propose to allocate the above synergies between MSP and SJLP?
>
> A. For power supply synergies, the company plans to employ a synergy sharing plan patterned on the Allocation Agreement proposed by Missouri Public Service Commission ("Commission") Staff witness James C. Watkins in Commission Case No. EM-97-515. The proposed plan is contained in Schedule RWH-10.
>
> Q. What are the main elements of the proposed synergy sharing plan?
>
> A. The main elements of the proposed synergy sharing plan are as follows:
>
> 1. *Existing generation capacity costs and purchased power capacity costs will remain with the entity which owned or had contracted for such capacity prior to the closing of the merger.*
>
> 2. New generation and/or purchased capacity and associated cost will be assigned to each entity on the basis of the capacity needs of each entity. The assignment will be on an equal cost per kilowatt basis.
>
> 3. The power supply portfolio of the combined entity will be dispatched in a manner to minimize the overall power supply cost of the combined system. Energy savings achieved will be allocated to SJLP since none of the savings would be possible absent the merger.

(Emphasis supplied).

In Case No. EM-97-515, the Staff, Public Counsel, Western Resources and KCPL entered into a Stipulation And Agreement which, among other things, provided that before the Commission's order approving the merger, they would jointly file with the Commission an Allocations Agreement for Commission approval which "maintain[s] the current benefits of KCPL's low fuel costs for Missouri jurisdictional customers . . ." The Conceptual Framework

For A Generation And Transmission Costs Allocations Agreement that was filed with the Commission states at B.1. on page 1 that:

> The KCPL and "Western" (KPL and KGE) Divisions of Westar shall have assigned to them the existing generation capacity and associated fixed generation costs as were owned and contracted for by that Division prior to the closing of the merger of Western and KCPL. This assignment shall include existing contracts for purchased capacity, any upgrades to existing generation capacity, as well as the assignment of Hawthorn 5 or its replacement to the KCPL Division.

Thus, respecting the merger of SJLP and UtiliCorp, for purposes of rate base, revenues and expense determinations, UtiliCorp proposed that MPS and SJLP be treated as retaining their former generating units and purchased power contracts. The MPS – SJLP Electric Allocations Agreement captures any savings from jointly dispatching the former MPS and SJLP generating units and purchased power, and allocates separately to MPS and SJLP those savings as if MPS and SJLP had retained their former generating units and purchased power contracts. Thereby, SJLP maintains for its customers the low costs of its former generating units and purchased power contracts. Thus, the indication at oral argument on August 14, 2001 by statement of counsel for UtiliCorp that SJLP's rates will eventually be sought to be moved up to MPS's rates was new information to the Staff. The Staff knows full well that in the UtiliCorp – SJLP merger case it opposed the UtiliCorp – SJLP regulatory plan and the Commission rejected it, but in said case it was clear from the evidence submitted by UtiliCorp – SJLP that separate divisional rates would be maintained for a period of at least ten years after the commencement of joint dispatch of MPS's and SJLP's generation.

2. Returning to *McKittrick*, the Office of the Public Counsel (Public Counsel) may seek to make the argument that *McKittrick* predates the setting of rates based on consideration of all relevant factors pronouncement of *State ex rel. Utility Consumers Council of Missouri, Inc. v. Public Serv. Comm'n,* 585 S.W.2d 41 (Mo.banc 1979) (hereinafter referred to as *UCCM*), which

it clearly does. The Commission will remember that the *UCCM* Court found a statutory basis, Section 393.270.4, for its holding that the Commission is required to set rates based upon a consideration of all relevant factors:

> Section 393.270 empowers the commission to investigate matters about which complaint may be made, or to investigate to ascertain facts necessary to the exercise of its powers and to fix *maximum* rates after hearing and investigation upon consideration of all relevant factors. . . .
>
> . . . Section 393.270(4) states that the commission:
>
> > "may consider all facts which in its judgment have any bearing upon a proper determination of the question although not set forth in the complaint and not within the allegations contained therein, with due regard, among other things, to a reasonable average return . . . ."
>
> This court has interpreted that provision, in a case addressing the method of valuation of property in determining the utility's proper rate of return: "[T]he phrase 'among other things' clearly denotes that 'proper determination' of such charges is based upon *all* relevant factors," [See New York Telephone Co. v. Public Service Commission, 1956, 309 N.Y. 569, 132 N.E.2d 847, 850] *State ex rel. Missouri Water Co. v. Public Service Comm'n*, 308 S.W.2d 704, 719 (Mo. 1957) . . . .
>
> Although the quoted section of the statute refers to "complaints", the requirement that all relevant factors be considered is of course applicable under the file and suspend method also. *Missouri Water Co.* was itself an appeal by the water company from a rate fixed by the commission after hearing under the file and suspend method. . . .

585 S.W.2d at 56. Although *State ex rel. Missouri Water Co. v. Public Serv. Comm'n*, 308 S.W.2d 704 (Mo. 1957) (hereinafter referred to as *Missouri Water Co.*) does not predate *McKittrick*, the Staff would note that the 1957 *Missouri Water Co.* decision references a 1930 Missouri Supreme Court decision, *State ex rel. City of St. Joseph v. Public Serv. Comm'n*, 325 Mo. 209, 30 S.W.2d 8, 10 (Mo.banc 1930), which states, in part, as follows: "There is no fixed rule for determining the fair value of property for rate-making purposes. *All facts which shed light on the question must be given due consideration. . . .*" (Emphasis supplied). Thus, the Staff

does not believe that the setting of rates based on consideration of all relevant factors is limited to public utility regulation in Missouri after the 1979 Missouri Supreme Court decision in *UCCM*. The basis for this standard is not merely the Missouri Supreme Court decision in *UCCM*.

3. For purposes of clarity respecting questions from the bench during the August 14, 2001 oral argument, the Staff will relate how it intends to audit UtiliCorp under the two different scenarios of (a) MPS being the only division of UtiliCorp having a rate case pending before the Commission and (b) both MPS and SJLP having rate cases pending before the Commission.

Under the scenario of only MPS having a rate case pending, the Staff will audit in detail revenues, expenses and rate base of MPS and will audit in much less detail the revenues, expenses and rate base of SJLP. The Staff's audit of SJLP will be more than a book audit, but it will not be a typical full-scale, general rate case audit or full-scale, complaint case audit of SJLP by the Staff.

This less detailed audit of a utility's revenues, expenses and rate base for ratemaking purposes also occurs under other scenarios. For example, when the earnings surveillance data, which the larger utilities report to the Commission's financial analysis department on a monthly basis, causes the Staff to believe that a utility may be earning significantly in excess of a reasonable rate of return, the Staff will initiate a less than full-scale earnings audit of that utility, based on the availability of Staff auditors.

The triggering event may not be the surveillance data. When the Tax Reform Act of 1986 reduced corporate tax rates, the Commission itself initiated an investigation into the effect of the new tax law on the Missouri earnings of public utilities operating in this state, Case No. AX-87-48, In the Matter of the Investigation of the Revenue Effects Upon Missouri Utilities

of the Tax Reform Act of 1986. (See 29 Mo.P.S.C.(N.S.) 51-52 for a table of Commission cases concerning this investigation.) The Staff performed less than full-scale audits of the larger utilities under the Commission's rate jurisdiction. Although the Tax Reform Act of 1986 was a single factor, it was a very material factor, and when the Staff conducted its less than full-scale audits, it looked at much more than the effect of the Tax Reform Act of 1986. The Staff was able to negotiate rate reductions when it was clear that the Staff would file an excessive earnings complaint case, if "voluntary" rate reductions were not forthcoming.

In such circumstances as indicated above, and in particular regarding the audit that the Staff will perform of SJLP if Case No. ER-2001-672 proceeds, the Staff would note the following examples. Although the Staff will look at payroll specific to SJLP, the Staff, for example, will not likely perform a detailed review of vacancies. Although the Staff will look at expenses specific to SJLP, the Staff, for example, will not likely look at the expenses charged SJLP or the work performed for SJLP by other divisions or affiliates of UtiliCorp. Although the Staff will look at depreciation expense, the Staff, for example, will not likely perform its own depreciation study respecting rate base assigned to SJLP. SJLP does not have service territory and provide utility service in any state other than Missouri, so although the Staff will look at allocations respecting SJLP, it will not look in detail at allocations of common costs among the electric, steam, natural gas and non-regulated operations of SJLP.

If the Staff were to look at each of these areas, or if the Staff were to look at each of these areas in greater detail, what the Staff might find, might cause the Staff to make an "adjustment" to SJLP booked numbers for the purpose of the Staff obtaining an overview of SJLP revenue requirement or excessive earnings. If the Staff does not make an adjustment in a particular SJLP area, this does not mean that the Staff has no concerns or issues respecting that

area. No adjustment may only mean that the Staff did not perform a detailed, in depth review of that SJLP area, or the Staff may not have looked at that SJLP area at all. These adjustments to SJLP booked numbers would not have an impact on the Staff's determination of MPS's revenue requirement or excessive earnings. Although the number of employees of the Commission is not inconsequential, the number of employees is not large enough to permit the Staff to audit every public utility in the state at a uniform level of detail every so often, regardless of the size of the utility and whether something has occurred that has brought that utility in particular to the attention of the Commission and/or the Staff.

Based on the results of a less than full-scale Staff audit, the Staff might suggest to a utility that it should agree to reduce its rates by "X-amount" and thereby avoid a full-scale audit, which would in all likelihood (a) increase the size of the excessive earnings found by the Staff and (b) increase the size of the rate reduction filed for by the Staff, barring a rate reduction agreed to by the utility.

Under the scenario of the Commission dismissing the June 8, 2001 tariff filing of UtiliCorp for its MPS division, and UtiliCorp filing new schedules, i.e., tariffs, for both MPS and SJLP, the Staff would conduct full-scale earnings audits of MPS and SJLP. If the Commission were to decide that UtiliCorp cannot file an electric general rate case for MPS without also filing an electric general rate case for SJLP, the Staff due to limitations in the number of Staff auditors could not perform a full-scale earnings audit of SJLP on the procedural schedule that the Commission has adopted for Case No. ER-2001-672. Also, if the Commission were to adopt Public Counsel's view of Missouri law, the Staff would suggest that the Commission dismiss UtiliCorp's Case No. ER-2001-672 rather than permit UtiliCorp to keep Case No. ER-2001-672 in place and make a separate filing for a SJLP.

4. The Staff and UtiliCorp have mentioned that the utilities providing more than one utility service (electric, steam, natural gas, water and/or sewer) in Missouri generally have not been required to file rate cases at the same time for all utility services that they provide. The Staff noted at oral argument on August 14, 2001 concerns expressed by the Commission when in the past the Staff proposed in UE and KCPL electric cases, electric allocation changes that would materially increase steam rates if the Staff's allocation proposal in electric cases were followed by the Commission in subsequent steam cases.

In Case No. ER-82-52, a UE electric, general rate increase case, the Staff proposed a change in the allocation of common generating facilities between electric and steam systems such that electric rates would be decreased by approximately 0.07%, but if the Commission applied the allocation methodology proposed by the Staff in UE's next steam case, then steam customers would see an increase in steam rates by approximately 7.0% as a result of the change in allocations. In *Re Union Electric Co.*, Case No. ER-82-52, Report And Order, 25 Mo.P.S.C.(N.S.) 194, 212-13 (1982), the Commission rejected the Staff's allocation proposal stating as follows:

> In the Commission's opinion adoption of the Staff's proposal would create a serious due process problem in that the people to be affected the most, the steam heating customers, have not been notified of this proposal and are unaware of any potential increase in steam rates in the magnitude described. An inquiry into this allocation may either take place in a steam rate case or in the Company's next electric case, but only with adequate notice to the steam customers of such a substantial change in allocation. For the foregoing reasons the proposed Staff reallocation of Ashley should be rejected.

25 Mo.P.S.C.(N.S.) at 213.

The Staff also noted at oral argument on August 14, 2001 the Commission's decision on an electric/steam allocations issue in a KCPL electric rate increase case, *Re Kansas City Power & Light Co.*, Case No. ER-83-49, Report And Order, 26

Mo.P.S.C.(N.S.) 104, 137-39 (1983). In that case, the Staff proposed that KCPL's Grand Avenue Station allocation between electric and gas operations be changed from 69.9% electric and 30.1% steam to 29.71% electric and 70.29% steam. The Commission rejected the Staff's proposal and ordered that in its next case, KCPL should file simultaneously revised tariffs for both electric and steam service. KCPL was also directed to file in its next case its schedule for phasing Grand Avenue Station out of electric service and phasing allocation of 100% of Grand Avenue Station to steam service. The Commission directed that Jackson County and Kansas City steam customers should be made aware at earliest possible date. *See Re Kansas City Power & Light Co.*, Case Nos. EO-85-185 and EO-85-224, Report And Order, 28 Mo.P.S.C.(N.S.) 228, 411-14 (1986).

5. In response to a question posed at the August 14, 2001 oral argument, the Staff notes that paragraph 1 of UtiliCorp's and St. Joseph Light & Power Company's October 19, 1999 Joint Application for authority to merge states, among other things, that "UtiliCorp is an 'electrical corporation,' a 'gas corporation' and a 'public utility' as those terms are defined in Section 386.020, RSMo. Supp. 1998 . . . ." Paragraph 2 of UtiliCorp's and St. Joseph Power & Light Company's October 19, 1999 Joint Application for authority to merge states, among other things, that "SJLP is an 'electrical corporation,' a 'gas corporation,' 'heating company' and a 'public utility' as those terms are defined in Section 386.020, RSMo. Supp. 1998 . . . ."

6. Finally, the Staff would note that at the bottom of page 7 in the last two sentences of the Staff's Response To Commission Order Directing Filing, which was submitted on July 27, 2001, the Staff refers to 4 CSR 240.065(1). That reference should be to 4 CSR 240-2.065(1).

Wherefore the Staff submits this Additional Staff Response for the Commission's consideration.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 24th day of August, 2001.

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