

Missouri Public Service Commission

Respond Data Request

Data Request No.	0356
Company Name	MO PSC Staff-(All)
Case/Tracking No.	ER-2019-0374
Date Requested	4/6/2020
Issue	Rate of Return - Capital Structure
Requested From	Peter Chari
Requested By	David Murray
Brief Description	the \$395 million of LUCo off-balance-sheet debt was in fact used for investment
Description	See page 9 of David Murray's surrebuttal testimony. Mr. Murray testifies as follows: "During the technical conference, Empire acknowledged that the \$395 million of LUCo off-balance-sheet debt was in fact used for investment in LUCo's regulated utility assets." Does Staff witness Mr. Chari agree with this statement? If not, please explain what parts of the statement Mr. Chari does not agree with and why. What investigation has Mr. Chari performed in order to verify the facts as it relates to this statement?
Response	Supplemental Response: Staff does not entirely agree. Staff's understanding is that debt held by LUF may not be used solely for investment in LUCo's regulated assets. As to the specifics of the use of the \$395 million debt held by LUF, at the technical conference Empire deferred this question for further investigation. Data Request Response provided by Peter Chari (peter.chari@psc.mo.gov).
Objections	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.

Security : Public

Rationale :

NA