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Exhibit No. 301P

Staff – Exhibit 301P Kimberly K. Bolin Rebuttal Testimony File No. GC-2022-0158

Exhibit No.: Issue(s): Accounting Authority Order Witness: Kimberly K. Bolin Sponsoring Party: MoPSC Staff Type of Exhibit: Rebuttal Testimony Case No.: GC-2022-0158 Date Testimony Prepared: March 30, 2022

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL & BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

REBUTTAL TESTIMONY

OF

KIMBERLY K. BOLIN

OZARKS MEDICAL CENTER, d/b/a Ozarks Healthcare VS. SUMMIT NATURAL GAS OF MISSOURI, INC.

CASE NO. GC-2022-0158

Jefferson City, Missouri March 2022

** Denotes Confidential Information **

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1	REBUTTAL TESTIMONY
2	OF
3	KIMBERLY K. BOLIN
4	OZARKS MEDICAL CENTER, d/b/a Ozarks Healthcare
5 6	VS. SUMMIT NATURAL GAS OF MISSOURI, INC.
7	
8	CASE NO. GC-2022-0158
9	Q. Please state your name and business address.
10	A. My name is Kimberly K. Bolin. My business address is P. O. Box 360, Suite 440,
11	Jefferson City, MO 65102.
12	Q. By whom are you employed and in what capacity?
13	A. I am the Director of the Financial and Business Analysis Division for the Missouri
14	Public Service Commission ("Commission").
15	Q. Please describe your educational background and work experience.
16	A. I graduated from Central Missouri State University (now University of
17	Central Missouri) in Warrensburg, Missouri, with a Bachelor of Science in Business
18	Administration, major emphasis in Accounting, in May 1993. Before coming to work at the
19	Commission, I was employed by the Missouri Office of the Public Counsel ("OPC") as a
20	Public Utility Accountant from September 1994 to April 2005. I commenced employment with
21	the Commission in April 2005.
22	Q. What was the nature of your job duties when you were employed by OPC?
23	A. I was responsible for performing audits and examinations of the books and records
24	of public utilities operating within the state of Missouri.

Q. Have you previously filed testimony before the Commission?
 A. Yes, numerous times. Please refer to Schedule KKB-r1, attached to this
 Rebuttal Testimony, for a list of the major audits in which I have assisted and filed testimony with
 OPC and with the Commission.

- Q. What knowledge, skills, experience, training and education do you have in the areas
 of which you are testifying as an expert witness?
- A. I have received continuous training at in-house and outside seminars on technical
 ratemaking matters, both when employed by OPC and since I began my employment at the
 Commission. I have been employed by this Commission or by OPC as a Regulatory Auditor for
 over 25 years and have submitted testimony on ratemaking matters numerous times before the
 Commission. I have also been responsible for the supervision of other Commission employees in
 rate cases and other regulatory proceedings.

13 EXECUTIVE SUMMARY

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Q. What is the purpose of your testimony?

15 The purpose of my testimony is to respond to Ozarks Medical Center d/b/a Ozarks A. 16 Healthcare's ("OMC") witness Josh Reeves' direct testimony and OMC's application for an 17 accounting authority order ("AAO"). As an alternative, OMC asks the Commission to order a special payment arrangement, with OMC paying ten percent of the total bill within thirty days 18 19 following the Commission order in this proceeding and paying the remainder out in equal 20 monthly installments over a ten-year period. Staff is opposed to granting an AAO for this situation especially since OMC wants the other ratepayers in SNGMO's service territory to pay for 21 22 OMC's bill. However, Staff is not opposed to any payment arrangements that could be made 23 between OMC and SNGMO.

1 OMC'S AAO REQUEST

Q. Who is OMC?

A. OMC is a non-profit organization that provides healthcare services in south central
Missouri and north-central Arkansas. Per OMC's website, OMC has a 114-bed acute care hospital,
and family medicine and specialty clinics throughout this region.

Q. What is OMC requesting in this case?

A. OMC is requesting the Commission issue an AAO to track and defer the disputed
cash-out debt incurred during Winter Storm Uri by OMC for future consideration in Summit
Natural Gas of Missouri, Inc.'s ("SNGMO") rate case. OMC believes the amortization of this
AAO should be spread across the service area since OMC is a not-for-profit entity.

11 Q. What is an AAO?

A. An AAO is an order from the Commission allowing a utility to account for a
reporting item in a different manner than normally prescribed in the utility's financial records.

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Q. How does an AAO benefit a utility?

A. An AAO allows a utility to defer costs associated with an extraordinary event. Under normal accounting practices, a utility would charge to expense as incurred on its income statement all costs associated with an extraordinary event. If deferral of those costs is authorized through an AAO, the utility treats the costs associated with an extraordinary event as a regulatory asset and records them on its balance sheet to be amortized over some period of time. An AAO gives the utility an **opportunity** to obtain rate recovery of the deferred item in the future.

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Q. What is a "regulatory asset?"

A. A regulatory asset is a cost booked by a utility as an asset on its balance sheet based
 upon a reasonable likelihood that regulatory authorities will agree to allow rate recovery of the
 cost later.

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Q. Under what circumstances are AAOs typically used in Missouri?

A. AAOs have usually been used to allow utilities to capture certain
unanticipated costs that have not been included in ongoing rate levels. The Commission has taken
the position that the costs in question must be associated with an event that is extraordinary,
unusual or unique in nature and not recurring. The costs associated with the event must also be
material. The classic example of an extraordinary event is the occurrence of a natural disaster,
such as a wind or ice storm, or major flood that affects a utility's service territory.

Q. Does the Commission make ratemaking findings when the AAO is issued?

A. No. The AAO grants the utility the ability to defer costs for consideration in the
next general rate case. The Commission has consistently held that the granting of the deferral does
not guarantee recovery of those costs.

Q. Has the Missouri Court of Appeals also stated that a distinction exists between
granting of deferral authority for certain costs and subsequent rate treatment of the costs in the
context of AAOs?

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A. Yes. In discussing the expectation of recovery for items included in an AAO, the Missouri Court of Appeals has said:

The whole idea of AAOs is to defer a final decision on current extraordinary costs until a rate case is in order. At the rate case, the utility is allowed to make a case that the deferred costs should be included, but again there is no authority for the proposition put forth here that the PSC is bound by the AAO terms.¹

¹ Mo. Gas Energy v. Pub. Serv. Comm'n, 978 S.W.2d 434, 438 (Mo. App. W.D. 1998).

1	Q.	Does Staff consider the Winter Storm Uri to be an extraordinary event?
2	А.	Yes.
3	Q.	Are the fuel costs incurred by OMC (revenues not collected by SNGMO) during
4	Winter Storm	Uri extraordinary costs for SNGMO?
5	А.	Yes. Based upon SNGMO's 2020 Annual Report filed with the Commission,
6	five percent of	of SNGMO's income computed before extraordinary items is \$224.188.
7	Q.	Did the Commission allow SNGMO to spread the fuel costs occurred during
8	Winter Storm	Uri over 5 years in Case No. GR-2022-0122?
9	А.	Yes. The Commission allowed SNGMO to spread approximately
10	** \$	** in fuel costs during Winter Storm Uri over five years.
11	Q.	Are the Winter Storm Uri costs currently being collected from retail gas customers?
12	А.	Yes, currently the cash-out imbalance of gas supply to OMC is included in the
13	PGA rates pa	id by customers. Once the cash-out imbalance for OMC is paid to SNGMO's
14	customers, P	GA rates will be credited. Please see the rebuttal testimony of Staff witness David
15	Sommerer for	r further discussion on how PGA rates are calculated.
16	Q.	Does Staff recommend the Commission grant an AAO for OMC's fuel costs?
17	А.	No. Staff does not recommend the Commission grant an AAO for OMC's fuel
18	costs because	these costs should not be borne by other ratepayers as suggested by OMC witness
19	Josh Reeves	on page 8 of his direct testimony. While Staff may agree that OMC provides a
20	valuable serv	ice for people in that region, making other customer's pay for OMC's fuel costs is
21	essentially as	king customers to involuntarily donate to OMC.
	2	

Q. As an alternative to an AAO, has OMC asked the Commission to order a specialpayment arrangement?

Q.

A. Yes. On page 7 of OMC witness Josh Reeves' Direct testimony, he requests in the
 alternative to an AAO that the Commission order a special payment arrangement. He states that
 OMC would pay 10 % of the total bill within 30 days following the Commission order and then
 pay the remainder in monthly installments over 10 years.

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Is Staff opposed to a payment arrangement for this bill?

A. No. Staff would prefer an extended payment arrangement to the granting of an
AAO in which the amortization of the AAO would be spread over all customers who are already
paying for their own costs incurred due to Winter Storm Uri. The other customers should not
have to pay for costs incurred by OMC.

- 10 Q. Does this conclude your rebuttal testimony?
- 11 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Ozarks Medical Center d/b/a Ozarks Healthcare,			
Complainant,			
v.			
Summit Natural Gas of Missouri, Inc.,			
Respondent.			

Case No. GC-2022-0158

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW KIMBERLY K. BOLIN, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Kimberly K. Bolin;* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

berly K. Bolin

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29% day of March, 2022.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2023 Commission Number: 15207377

Dianie L. Vaurt Notary Public

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
The Empire District Gas Company	GR-2021-0320	<u>Direct</u> – Excess ADIT and Tax Tracker	Pending
The Empire District Electric Company	EU-2021-0274	<u>Rebuttal</u> – Winter Storm Uri AAO	Pending
The Empire District Electric Company Ameren Missouri	ER-2021-0312 ER-2021-0240	Cost of Service Report– ARO,Amortization of Excess ADIT, RegulatoryLag and Risk MitigationRebuttal– Business Risk, Paygo, AROs,Transmission TrackerSurrebuttal- Non-FAC Wind Revenues,ADIT and Excess ADIT, Iatan/PCBEnvironmental Costs, Market PriceProtection Mechanism, Winter Storm UriCost of Service Report – COVID-19 AAO	Settled
Ameren Wissouri	ER-2021-0240	Cost Recovery, Rate Switching Tracker, Allocation Factors, Company Owned Life Insurance, Equity Issuance Costs, Tracker Mechanisms Proposals Policy <u>Surrebuttal</u> – Normalization of COVID-19 Costs, Allocations, AMI Software	Settled
Ameren Missouri	GR-2021-0241	Cost of Service Report - COVID-19 AAO Cost Recovery, AMI-Software, Allocation Factors Surrebuttal – Normalization of COVID-19 Costs, AMI Software	Settled
Evergy Missouri Metro and Evergy Missouri West	ET-2021-0151	Rebuttal Report – Accounting	Contested
Spire Missouri	GR-2021-0108	Cost of Service Report – COVID-19 AAO Recovery Surrebuttal – Trackers	Settled

KIMBERLY K. BOLIN			
<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested
			<u>or Settled</u>
Missouri-American	WR-2020-0344	<u>Cost of Service Report</u> – Future Test Year,	Settled
Water Company		Credit Card Fee Expense, Amortization of	
		Excess ADIT, COVID-19 AAO Recovery	
		<u>Rebuttal</u> – Future Test Year, COVID-19	
		AAO Recovery, Amortization of Excess	
		ADIT, Affiliate Transactions, AFUDC Rate	
		<u>Surrebuttal</u> – Future Test Year, COVID-19	
		AAO, Tax Cut and Jobs Act of 2017,	
		Outside Services, COVID Impacts on	
		Revenue	
Spire Missouri, Inc.	GU-2020-0376	<u>Rebuttal</u> – Accounting Authority Order,	Settled
		Lost Revenues	
Evergy Metro, Inc.,	EU-2020-0350	<u>Rebuttal</u> – Accounting Authority Order,	Contested
d/b/a Evergy Missouri		Lost Revenue, Carrying Costs	
Metro and Evergy			
Missouri West, Inc.			
d/b/a Evergy Missouri			
West			
Empire District Electric	ER-2020-0311	<u>Rebuttal</u> – Coal Inventory Adjustment	Settled
Company		Surrebuttal – Coal Inventory Adjustment	
Empire District Electric	ER-2019-0374	Direct – Overview of Staff's Filing	Contested
Company		Cost of Service Report – Executive	
		Overview, Test year/True-Up Period,	
		Vegetation Management Tracker	
		Regulatory Asset, Iatan and Plum Point	
		Carrying Costs, Stub Period Tax	
		Cut/Removal of Tax Impact, Tornado AAO,	
		Rate Case Expense Sharing, Credit Card	
		Fees, Clearing Accounts	
		<u>Rebuttal</u> – Asset Retirement Obligations,	
		AAO and Tracker Policy, Affiliate	
		Transactions	
		<u>Surrebuttal/True-Up</u> – Unamortized	
		Balance of Joplin AAO, Credit Card Fees,	
		Payroll Test year, Rate Case Expense	
		Sharing, LED Lighting, Low-Income Pilot	
		Program Amortization, Affiliate	
		Transactions	
		Supplemental – Jurisdictional Allocations,	
		Rate Case Expense, Management Expense,	
		Pension and OPEBs, Affiliate Transactions,	
		Software Maintenance	

		BERLY K. BOLIN	
<u>Company Name</u>	Case Number	Testimony/Issues	Contested
			<u>or Settled</u>
Confluence Rivers	WA-2019-0299	<u>Surrebuttal</u> – Quality of Service	Contested
Utility Operating Co.,		<u>Direct</u> – Net Book Value of Plant	
Inc.			
Osage Utility	WA-2019-0185	Surrebuttal – Rate Base, Acquisition	Contested
Operating Co., Inc.		Incentive	
Spire Inc.	GO-2019-0115	Staff Direct Report – Blanket Work Orders	Contested
	and GO-2019-	and Current Income Taxes	
	116		
Empire District Electric	AO-2018-0179	<u>Direct</u> – Moneypool	Contested
Company and Liberty		<u>Surrebuttal</u> - Moneypool	
Utilities			
Confluence Rivers	WM-2018-0116	<u>Direct</u> – Rate Base, Roy L Utilities	Settled
Utility Operating	and SM-2018-		
Company, Inc.	0117		
Spire Missouri Inc.	GO-2016-0332,	Direct – Removal of Plastic Main and	Contested
-	GO-2016-0333,	Service Line Replacement Costs	
	GO-2017-0201,	1	
	GO-2017-0202		
	GO-2018-0309		
	and GO-2018-		
	0310		
Missouri-American	WR-2017-0285	Cost of Service Report – Pension/OPEB	Settled
Water Company		Tracker, FAS 87 Pension Costs, FAS 106	
		OPEBs Costs, Franchise Taxes	
		<u>Rebuttal</u> –Defined Contribution Plan,	
		Cloud Computing, Affiliate Transaction	
		Rule (Water Utility)	
		<u>Surrebuttal</u> – Rate Case Expense	
Missouri-American	WO-2018-0059	Direct – ISRS Overview, Accumulated	
Water Company		Deferred Income Taxes, Reconciliation	
Missouri Gas Energy	GO-2016-0332	<u>Rebuttal</u> – Inclusion of Plastic Main and	Contested
and Laclede Gas	and GO-2016-	Service Line Replacements	
Company	0333	1	
Empire District Electric	EM-2016-0213	<u>Rebuttal</u> – Overview of Transaction,	Settled
Company/Liberty		Ratemaking /Accounting Conditions,	
Utilities		Access to Records	
		Surrebuttal – OPC Recommended	
		Conditions, SERP	
Hillcrest Utility	WR-2016-0064	<u>Direct</u> – Partial Disposition Agreement	Contested
Operating Company,			
Inc.			
1 0 1 0			

	KIMBERLY K. BOLIN				
<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	Contested or Settled		
Empire District Electric Company	ER-2016-0023	Requirement Report – RivertonConversion Project and Asbury Air QualityControl SystemDirect – Overview of Staff's RevenueRequirement Report and Overview ofStaff's Rate Design Filing	Settled		
Missouri-American Water Company	WR-2015-0301	Report on Cost of ServiceAllocation, District AllocationsRebuttal– District Allocations, BusinessTransformationSurrebuttal– District Allocations,Business Transformation, Service CompanyCosts	Settled		
Empire District Electric Company	ER-2014-0351	Direct– Overview of Staff's FilingRebuttal- ITC Over-Collection, Cost ofRemoval Deferred Tax Amortization, StateFlow-ThroughSurrebuttal– Unamortized Balance ofJoplin Tornado, ITC Over-Collections,Cost of Removal Deferred TaxAmortization, State Flow-Through,Transmission Revenues and Expenses	Settled		
Brandco Investments/ Hillcrest Utility Operating Company, Inc.	WO-2014-0340	<u>Rebuttal</u> – Rate Base and Future Rates	Settled		
Lake Region Water & Sewer	WR-2013-0461	Direct– Overview of Staff's FilingReport on Cost of Service– True-Up,Availability Fees, Sewer OperatingExpense, Sewer Equipment MaintenanceExpenseSurrebuttal– Availability FeesTrue-Up Direct– Overview of True-UpAuditTrue-Up Rebuttal– Corrections to True-UpUp	Contested		

			0 4 4 1
<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested</u>
Empire District Electric	ED 2012 0245	Diment Organizary of Staffer Filing	or Settled
Empire District Electric	ER-2012-0345	Direct - Overview of Staff's Filing	Settled
Company		<u>Report on Cost of Service</u> – SWPA Hydro	
		Reimbursement, Joplin Tornado AAO	
		Asset, SPP Revenues, SPP Expenses,	
		Regulatory Plan Amortization Impacts,	
		SWPA Amortization, Tornado AAO	
		Amortization	
		Rebuttal – Unamortized Balance of Joplin	
		Tornado AAO, Rate Case Expense, True-	
		Up and Uncontested Issues	
		Surrebuttal – Unamortized Balance of	
		Joplin Tornado AAO, SPP Transmission	
		Expense, True-Up, Advanced Coal	
		Investment Tax Credit	
Missouri-American	WR-2011-0337	Direct – Overview of Staff's Filing	Settled
Water Company		Report on Cost of Service - True-Up	
1 2		Recommendation, Tank Painting Tracker,	
		Tank Painting Expense	
		<u>Rebuttal</u> - Tank Painting Expense,	
		Business Transformation	
		<u>Surrebuttal</u> – Tank Painting Tracker,	
		Acquisition Adjustment	
Missouri-American	WR-2010-0131	Report on Cost of Service -	Settled
Water Company	WR-2010-0131	Pension/OPEB Tracker, Tank Painting	Settled
water company		Tracker, Deferred Income Taxes, FAS 87	
		Pension Costs, FAS 106 – Other Post-	
		Employment Benefits, Incentive	
		Compensation, Group Insurance and 401(k)	
		Employer Costs, Tank Painting Expense,	
		Dues and Donations, Advertising Expense,	
		Promotional Items, Current and Deferred	
	CD 2000 0424	Income Tax Expense	
Empire District Gas	GR-2009-0434	Report on Cost of Service – Prepaid	Settled
Company		Pension Asset, Pension Tracker	
		Asset/Liability, Unamortized Accounting	
		Authority Order Balances, Pension	
		Expense, OPEBs, Amortization of Stock	
		Issuance Costs, Amortization of Accounting	
		Authority Orders	
		<u>Direct</u> – Overview of Staff's Filing	
Laclede Gas Company	GT-2009-0056	Surrebuttal Testimony – Tariff	Contested

	KIIVII	SERLY K. BOLIN	
<u>Company Name</u>	Case Number	Testimony/Issues	Contested
Missouri-American Water Company	WR-2008-0311 & SR-2008-0312	Report on Cost of Service – Tank PaintingTracker, Lobbying Costs, PSC AssessmentDirect – Overview of Staff's FilingRebuttal – True-Up Items, UnamortizedBalance of Security AAO, Tank PaintingExpense, Fire Hydrant Painting ExpenseSurrebuttal – Unamortized Balance ofSecurity AAO, Cedar Hill Waste WaterPlant, Tank Painting Expense, Fire HydrantPainting Expense	or Settled Settled
Missouri Gas Utility, Inc.	GR-2008-0060	<u>Report on Cost of Service</u> – Plant-in Service/Capitalization Policy, Plant-in Service/Purchase Price Valuation, Depreciation Reserve, Revenues, Uncollectible Expense	Settled
Laclede Gas Company	GR-2007-0208	<u>Direct</u> - Test Year and True-Up, Environmental costs, AAOs, Revenue, Miscellaneous Revenue, Gross receipts Tax, Gas Costs, Uncollectibles, EWCR, AMR, Acquisition Adjustment	Settled
Kansas City Power and Light Company	ER-2006-0314	Direct - Gross Receipts Tax, Revenues, Weather Normalization, Customer Growth/Loss Annualization, Large Customer Annualization, Other Revenue, Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Payroll Taxes, Employer 401 (k) Match, Other Employee Benefits Surrebuttal - Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Other Employee Benefits	Contested
Missouri Gas Energy	GR-2006-0204	Direct - Payroll, Incentive Compensation, Payroll Taxes, Employee Benefits, Lobbying, Customer & Governmental Relations Department, Collections Contract	Settled

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Missouri Gas Energy	GU-2005-0095	<u>Rebuttal</u> - Accounting Authority Order <u>Surrebuttal</u> - Accounting Authority Order	Contested
The Empire District Electric Company	ER-2004-0570	<u>Direct</u> - Payroll	Settled
Missouri American Water Company & Cedar Hill Utility Company	SM-2004-0275	Direct - Acquisition Premium	Settled
Missouri Gas Energy	GR-2004-0209	Direct - Safety Line Replacement Program; Environmental Response Fund; Dues & Donations; Payroll; Customer & Governmental Relations Department Disallowance; Outside Lobbyist Costs Rebuttal - Customer Service; Incentive Compensation; Environmental Response Fund; Lobbying/Legislative Costs <u>True-Up</u> - Rate Case Expense	Contested
Osage Water Company	ST-2003-0562 / WT-2003-0563	Direct- Payroll <u>Rebuttal</u> - Payroll; Lease Payments to Affiliated Company; alleged Legal Requirement of a Reserve	Case Dismissed
Missouri American Water Company	WR-2003-0500	<u>Direct</u> - Acquisition Adjustment; Water Treatment Plant Excess Capacity; Retired Treatment Plan; Affiliated Transactions; Security AAO; Advertising Expense; Customer Correspondence	Settled
Empire District Electric	ER-2002-424	<u>Direct</u> - Dues & Donations; Memberships; Payroll; Security Costs <u>Rebuttal</u> - Energy Traders' Commission <u>Surrebuttal</u> - Energy Traders' Commission	Settled

Company Name	Case Number	Testimony/Issues	Contested or Settled
Laclede Gas Company	GR-2002-356	Direct- Advertising Expense; Safety Replacement Program and the Copper Service Replacement Program; Dues & Donations; Rate Case Expense <u>Rebuttal</u> - Gas Safety Replacement Program / Deferred Income Taxes for AAOs	Settled
Missouri-American Water Company	WO-2002-273	<u>Rebuttal</u> - Accounting Authority Order <u>Cross-Surrebuttal</u> - Accounting Authority Order	Contested
Environmental Utilities	WA-2002-65	<u>Direct</u> - Water Supply Agreement <u>Rebuttal</u> - Certificate of Convenience & Necessity	Contested
Warren County Water & Sewer	WC-2002-160 / SC-2002-155	<u>Direct</u> - Clean Water Act Violations; DNR Violations; Customer Service; Water Storage Tank; Financial Ability; Management Issues <u>Surrebuttal</u> - Customer Complaints; Poor Management Decisions; Commingling of Regulated & Non-Related Business	Contested
Laclede Gas Company	GR-2001-629	<u>Direct</u> - Advertising Expense; Safety Replacement Program; Dues & Donations; Customer Correspondence	Settled
Gateway Pipeline Company	GM-2001-585	<u>Rebuttal</u> - Acquisition Adjustment; Affiliated Transactions; Company's Strategic Plan	Contested
Empire District Electric	ER-2001-299	<u>Direct</u> - Payroll; Merger Expense <u>Rebuttal</u> - Payroll <u>Surrebutta</u> l- Payroll	Settled
Osage Water Company	SR-2000-556/ WR-2000-557	<u>Direct</u> - Customer Service	Contested

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
St. Louis County Water Company	WR-2000-844	Direct- Main Incident Expense	Settled
Missouri American Water Company	WR-2000-281/ SR-2000-282	DirectWater Plant Premature Retirement;Rate Case ExpenseRebuttalWater Plant PrematureRetirementSurrebuttalWater Plant PrematureRetirement	Contested
Laclede Gas Company	GR-99-315	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up	Contested
St. Joseph Light & Power	HR-99-245	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up <u>Rebuttal</u> - Advertising Expense <u>Surrebuttal</u> - Advertising Expense	Settled
St. Joseph Light & Power	ER-99-247	Direct - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs Rebuttal - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs Surrebuttal - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs	Settled
Laclede Gas Company	GR-98-374	Direct- Advertising Expense; Gas Safety Replacement AAO; Computer System Replacement Costs	Settled
Missouri Gas Energy	GR-98-140	<u>Direct</u> - Payroll; Advertising; Dues & Donations; Regulatory Commission Expense; Rate Case Expense	Contested

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Gascony Water Company, Inc.	WA-97-510	<u>Rebuttal</u> - Rate Base; Rate Case Expense; Cash Working Capital	Settled
Union Electric Company	GR-97-393	Direct - Interest Rates for Customer Deposits	Settled
St. Louis County Water Company	WR-97-382	<u>Direct</u> - Interest Rates for Customer Deposits, Main Incident Expense	Settled
Associated Natural Gas Company	GR-97-272	DirectAcquisition Adjustment; InterestRates for Customer DepositsRebuttalAcquisition Adjustment; InterestRates for Customer DepositsSurrebuttalInterest Rates for CustomerDeposits	Contested
Missouri-American Water Company	WA-97-45	<u>Rebuttal</u> - Waiver of Service Connection Charges	Contested
Imperial Utility Corporation	SC-96-427	Direct- Revenues, CIAC Surrebuttal- Payroll; Uncollectible Accounts Expense; Rate Case Expense, Revenues	Settled
St. Louis Water Company	WR-96-263	Direct-Main Incident Repairs Rebuttal- Main Incident Repairs Surrebuttal- Main Incident Repairs	Contested
Steelville Telephone Company	TR-96-123	<u>Direct</u> - Depreciation Reserve Deficiency	Settled

<u>Company Name</u>	Case Number	Testimony/Issues	<u>Contested</u> or Settled
Missouri-American Water Company	WR-95-205/ SR-95-206	Direct - Property Held for Future Use; Premature Retirement of Sewer Plant; Depreciation Study Expense; Deferred Maintenance Rebuttal - Property Held for Future Use; Premature Retirement of Sewer Plant; Deferred Maintenance Surrebutta l- Property Held for Future Use; Premature Retirement of Sewer Plant	Contested
St. Louis County Water Company	WR-95-145	<u>Rebuttal</u> - Tank Painting Reserve Account; Main Repair Reserve Account <u>Surrebuttal</u> - Main Repair Reserve Account	Contested