

*Exhibit No.:*  
*Issue(s):* Revenues - Weather  
*Witness:* Francisco Del Pozo  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* GR-2024-0106  
*Date Testimony Prepared:* August 22, 2024

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDSUTRY ANALYSIS DIVISION**

**TARIFF/RATE DESIGN DEPARTMENT**

**REBUTTAL TESTIMONY**

**OF**

**FRANCISCO DEL POZO**

**LIBERTY UTILITIES (Midstates Natural Gas) CORP.,**

**d/b/a Liberty**

**CASE NO. GR-2024-0106**

*Jefferson City, Missouri*  
*August 2024*



Rebuttal Testimony of  
Francisco Del Pozo

1           A.     Mr. Fox used the Kirksville Regional Airport (Kirksville)<sup>1</sup> weather station  
2 located four miles south of Kirksville town, Adair County, Missouri.

3           Q.     Does Staff agree with Mr. Fox's use of the Kirksville weather station to  
4 determine adjustments to sales and revenues for the SEMO division?

5           A.     No. The Kirksville weather station is not a proper weather station for calculating  
6 climate normals of the SEMO division. As I mentioned in my Direct Testimony, the ranking  
7 method to calculate normal weather estimates of daily normal temperature values requires  
8 records of the most extreme temperatures in each month of the 30-year normal, period of  
9 January 1, 1993, through December 31, 2022. The Kirksville Regional airport's most recent  
10 continuous period for recording temperature began in June 1998. Staff's attempts to substitute  
11 in the airport temperatures for the Kirksville city's temperatures were unviable<sup>2</sup>.

12           Q.     Do you have any alternative station in this case?

13           A.     Yes, the Columbia Regional Airport weather station for calculating climate  
14 normal of the SEMO division. Columbia, has sufficient and consistent daily data, and should  
15 still reasonably capture the temperature trends. Additionally, Columbia does lie approximately  
16 between Liberty's West and Northeast service areas.

17           Q.     Do you have any recommendations in this case?

18           A.     Yes, I recommend reliance on the weather data recorded in the  
19 Columbia Regional Airport weather station for calculating climate normal of the  
20 SEMO division

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<sup>1</sup> Station ID: 234549.

<sup>2</sup> Starting February 7, 2020 and continuing through today the Kirksville weather station has ceased reporting the daily temperatures (although some temperatures are reported, there are not enough for a statistical representation).

1 **TIME PERIOD**

2 Q. What is the time period that Liberty Midstates uses to calculate normal  
3 weather variables?

4 A. The time period used is 2003 to 2022<sup>3</sup>.

5 Q. Why does Staff have concerns with the Liberty Midstates using 20-year period  
6 of day weather data for its calculated daily degree days?

7 A. A climate normal is defined as the arithmetic mean of a climatological  
8 element computed over three consecutive decades, ideally, the data record for  
9 such a 30-year period should be free of any inconsistencies in observational practices  
10 (e.g., changes in station location, instrumentation, time of observation, etc.) and be serially  
11 complete (i.e. no missing values). When present, inconsistencies can lead to a non-climatic  
12 bias in one period of a station's record relative to another. Since the weather data from earlier  
13 years do not show the same trend with more recent data, 30-year model will consistently capture  
14 the relationship between weather conditions and historical customer usage.

15 **CONCLUSION**

16 Q. What is your recommendation?

17 A. I recommend that Commission order reliance on the weather normal Staff  
18 derived from daily weather data from the Midwestern Regional Climate Center<sup>4</sup> as the basis for  
19 weather normalization adjustments in this case.

20 Q. Does this conclude your rebuttal testimony?

21 A. Yes, it does

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<sup>3</sup> Correction to Eric Fox Direct Testimony "The normal HDD are calculated for the years 2003 through 2022; not ending in 2023 as stated in my direct testimony". Response to MPSC Data Request 0312.

<sup>4</sup> <https://mrcc.purdue.edu/about>

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Request of Liberty )  
Utilities (Midstates Natural Gas) Corp. ) Case No. GR-2024-0106  
d/b/a Liberty to Implement a General Rate )  
Increase for Natural Gas Service in the )  
Missouri Service Areas of the Company )

**AFFIDAVIT OF FRANCISCO DEL POZO**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW FRANCISCO DEL POZO** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Francisco Del Pozo*; and that the same is true and correct according to his best knowledge and belief.

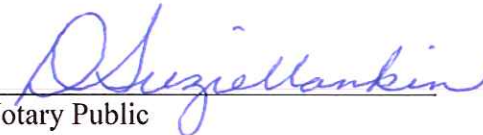
Further the Affiant sayeth not.

  
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**FRANCISCO DEL POZO**

**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 20th day of August 2024.

D. SUZIE MANKIN  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
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Notary Public