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Missouri Public Service Commission

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June 5, 2001

WESS A. HENDERSON Director, Utility Operations

ROBERT SCHALLENBERG Director, Utility Services

DONNA M. KOLILIS Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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JUN 0 5 2001

Service Commission

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-2001-299

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a REVISED RECONCILIATION OF PARTIES' POSITIONS ON THE REVENUE REQUIREMENT ISSUES.

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,

Dennis L. Frey

Associate General Counsel

(573) 751-8700

(573) 751-9285 (Fax)

dfrey03@mail.state.mo.us

DLF:ccl Enclosure

cc: Counsel of Record

Date (-6-01 Case No. <u>FR-2001-</u>297

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of The Empire District Electric Company's Tariff Sheets Designed to Implement a General Rate Increase for Retail Electric Service Provided to Customers in the Missouri Service Area of the Company))))	Case No. ER-2001-299

REVISED RECONCILIATION OF PARTIES' POSITIONS ON THE REVENUE REQUIREMENT ISSUES

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on its own behalf and on behalf of The Empire District Electric Company ("Company") and the Office of the Public Counsel ("OPC"), and Praxair, Inc. ("Praxair") and states the following to the Missouri Public Service Commission ("Commission"):

- 1. On May 23, 2001, pursuant to the procedural schedule ordered in this case, the Staff, acting on behalf of the above-listed parties, filed a Reconciliation of Parties' Positions on the Revenue Requirement Issues. On May 31, 2001, during the evidentiary hearing in this case, the presiding Regulatory Law Judge, directed the filing of another reconciliation, incorporating any changes to the originally filed reconciliation that might be appropriate. Accordingly, the Staff submits, on behalf of the above-listed parties the Revised Reconciliation of Parties' Positions on the Revenue Requirement Issues, which is marked as Appendix A and attached hereto.
- 2. With one exception, the dollar values presented in the Revised Reconciliation are the same as those presented in the original Reconciliation, filed May 23. The exception is that the "Staff/Company Difference" with respect to the "Depreciation Expense" issue has been broken

down into three component parts; namely, differences associated with Net Salvage, Amortization of Net Salvage, and Shorter Plant Life. The total of the three components is approximately equal \$10,185,882, which is also the originally filed value, with rounding error accounting for the difference.

Respectfully submitted,

DANA K. JOYCE General Counsel

Dennis L. Frey

Associate General Counsel

Missouri Bar No. 44697

Attorney for the Staff of the

Missouri Public Service Commission

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dfrey03@mail.state.mo.us (e-mail)

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 5th day of June 2001.

File Name: EDE Case NO-2001-299 Case Reconciliation.

Sheet: A

Line umber	Description of Issues		Staff Position	Company Position	OPC Position	·	Staff/ Company Difference	ļ	Change In Revenue Requirement	ſ	Change In Revenue Requirement
1	Company Adjusted Revenue Requirement Revenue Items;			,						\$	39,143,661
	Expense Items: Payroll - Incentive Compensation Bad Debt Expense - Factor-up on additional Revenue Req SLCC Plant Maintenance Expense (A) (A) This item is included in Staff's \$35,000,000 Allowance - Staff's	\$ \$ aff inclu	- - ided \$8,000,000	\$ 264,925 \$ 50,431 times Juris factor of	.8013 or \$6,410,400.	\$ \$	(264,925) (50,431)	\$	(264,925) (50,431)	\$	38,878,736 38,828,305
	Depreciation Expense Difference associated with Net Salvage Difference Associated with Amortization of Net Salvage Difference Associated with the Shorter Plant Life	\$	18,249,834	\$ 28,445,716		\$ \$ \$	(10,195,882) (2,832,250) (1,699,350) (5,664,500)	\$	(10,195,882)	\$	28,632,423
	Rate of Return/Cost of Capital Differences Return on Equity difference between Staff and Public Counsel Capital Structure difference between Staff and Public Counsel Rate Base Differences other than SLCC unit Return on Equity difference between Public Counsel and Com	on Sta						\$ \$ \$	3,424,648 448,983 (1,509,103) 5,164,480	\$ \$ \$	25,207,775 24,758,792 26,267,895 21,103,415
	Capital Structure difference between Public Counsel and Com	pany						\$	1,751,183	\$	
	Capital Structure difference between Public Counsel and Com Staff Adjusted Revenue Requirement as of May 22 - Run D inclu		allowance of \$3	5,000,000 for Known	and Measurable Char	nges		\$			19,352,232
			allowance of \$3 Percent Of Capital 39.80% 0.00% 60.20% 0.00% 100.00%	5,000,000 for Known Embedded Cost 7.88%	and Measurable Char Mid Point Weighted Cost 9,03% 3,59% 0,00% 4,74% 0,00% 8,33%	nges	Gross Weighted Cost 5.83% 0.00% 4.74% 0.00% 10.57%	\$		\$	19,352,232
	Staff Adjusted Revenue Requirement as of May 22 - Run D inclused in the Staff's Rate of Return Calculation; Common Stock Equity Preferred Stock Long-Term Debt Short-Term Debt		Percent Of Capital 39.80% 0.00% 60.20% 0.00%	Embedded Cost	Mid Point Weighted Cost 9,03% 3,59% 0,00% 4,74% 0,00% 8,33%	nges	Veighted Cost 5.83% 0.00% 4.74% 0.00%	\$		\$	19,352,232 19,352,232

Service List for Case No. ER-2001-299 Verified: June 4, 2001 (ccl)

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