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# Respond Data Request

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Data Request No.

0483

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Acquired Degrees and Work Experience

Description

Please list all educational degrees acquired by you, noting the title of each degree (such as bachelor's degree in education with a specialization in elementary education), the name and address of the educational institution which awarded the degree, and the date

the degree was obtained.

Response

B.S.B.A. with an Emphasis in Finance & Banking and Real Estate from University of Missouri-Columbia - May 1995 MBA with an Emphasis in Accounting from Lincoln University - December 2003

**Objections** 

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-2004-0570 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

With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.

Case No(s). El 2004 05

## Respond Data Request

Data Request No.

0484

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Acquired Degrees and Work Experience

Description

State whether you have a doctoral degree in any subject. If so, state the name and address of the educational institution which awarded the degree and the date the degree was obtained.

Response

I do not have a doctoral degree in any subject.

Objections

NA

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Security:

**Public** 

Rationale:

NA

## Respond Data Request

Data Request No.

0485

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Acquired Degrees and Work Experience

Description

Response

Please list all jobs which you have held in the field of regulatory finance. For each, state the name and address of your employer,

the dates of employment, and a brief description of your duties.
Public Utility Financial Analyst (June 2000 through September

2003) Utility Regulatory Auditor III (September 2003 through present) Missouri Public Service Commission 200 Madison Street

Jefferson City, MO 65102 Duties: Review merger, acquisition, certificate and finance Applications and make appropriate recommendations, whether through testimony, a written

recommendations, whether through testimony, a written recommendation to the Commission or a memorandum in support of a stipulation and agreement. Analyze Missouri utility companies' cost of capital and make appropriate recommendations. Prepare expert direct testimony to report on cost-of-capital studies. Prepare expert rebuttal testimony on other rate of return witnesses in rate case proceedings. Prepare expert surrebuttal testimony to respond to other witnesses rebuttal testimony. Provide expert oral testimony as needed in proceedings before the Commission. Analyze financial data submitted by telephone companies applying for a certificate to provide competitive local exchange certificates. Review analysis and recommendations of other Financial Analysis Department Staff and provide guidance as necessary while the Manager of the Financial Analysis Department has been mobilized in the military.

Objections

NA

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EXHIBIT

# Missouri Public Commission

Security : Rationale :

NΑ

With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.

**EXHIBIT** 

# Respond Data Request

Data Request No.

0486

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

**David Murray** 

Requested By

Angela Cloven

**Brief Description** 

Acquired Degrees and Work Experience

Description

Describe the last three jobs held by you immediately prior to your current position. For each, state the name and address of your employer, the dates of employment, and a brief description of your

duties.

Response

Workers' Compensation Specialist (October 1997 through June 2000) Missouri Department of Insurance 301 West High Street Jefferson City, Missouri 65101 Duties: Analyzed submission of workers' compensation products, rules and rates to ensure compliance with Missouri's statutes and regulations. Analyzed submission of credit insurance products, rules and rates to ensure compliance with Missouri's statutes and regulations. Monitored the operation of the assigned risk carrier in Missouri. Worked with the Division of Worker's Compensation personnel on various workers' compensation issues. Insurance Product Analyst I/II (July 1995 through October 1997) Missouri Department of Insurance 301 West High Street Jefferson City, Missouri 65101 Duties: Analyzed submission of workers' compensation products, rules and rates to ensure compliance with Missouri's statutes and regulations. Assisted the insurance-buying public with workers' compensation

issues by answering telephone inquiries and written

correspondence. Provided technical assistance to Departmental Staff. Sorter (April 1993 through July 1995) United Parcel Service 13818 Rider Trail Earth City, MO 63045 Duties: Sorted packages

based on the memorization of city, state and zip code.

**Objections** 

NA

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# Missouri Public Commission

Security:

Public

Rationale:

NA

With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.

EXHIBIT

#### **Respond Data Request**

Data Request No.

0487

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Acquired Degrees and Work Experience

Description

State the date on which you applied for your current position, describe all application materials which were provided to your current employer before a decision was reached to hire you for your current position, and state the date on which you were hired for

your current position.

Response

March 3, 2000 – Sent letter of interest Materials provided: cover letter, application, resume, transcripts and writing sample May 16,

2000 – Offer letter sent to me

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

#### Respond Data Request

Data Request No.

0488

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Licenses, Certifications, Memberships

Description

State whether you are a certified public accountant.

Response Objections

NA

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Security:

**Public** 

Rationale:

NA

# Respond Data Request

Data Request No.

0489

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Licenses, Certifications, Memberships

Description

State the name of each and every professional license or certificate

held by you. For each, state the name and address of the

licensing/certificating entity and the date the license or certificate

was obtained.

Response

None.

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

#### Respond Data Request

Data Request No.

0490

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Licenses, Certifications, Memberships

Description

State the name of each and every professional organization of which you are a member. For each, state the name and address of

the organization and any office held by you in the organization.

Response

None.

**Objections** 

NA

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Security:

Public

Rationale:

NA

#### **Respond Data Request**

Data Request No.

0491

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Specialized Training

Description

Please describe all specialized training you have had in the field of regulatory finance. Include the name and date of each seminar or class attended and the name and date of publication of all works

reviewed.

Response

Fundamentals of Utility Finance – January 2001 (Publication: Fundamentals of Utility Finance in a Restructured Environment binder) Training from Ron Bible, Financial Analysis Department Manager, and on-the-job experience since commencement of

employment in June 2000.

**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-2004-0570 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

# Respond Data Request

Data Request No.

0495

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Reviewed

Description

Provide the title, publisher, and date of publication for each book, treatise, or other work you have read or reviewed on the subject of rate of return methodologies for regulated utilities. Also state the general time period in which you first read or reviewed each book,

treatise, or other work.

Response

Fundamentals of Utility Finance - January 2001 (Publication: Fundamentals of Utility Finance in a Restructured Environment binder) Training from Ron Bible, Financial Analysis Department Manager, and on-the-job experience since commencement of

employment in June 2000.

Objections

NA

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Security:

**Public** 

Rationale:

NA

#### Respond Data Request

Data Request No.

0492

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Specialized Training

Description

Please describe all specialized training you have had in the area of rate of return and/or cost of capital for regulated utility companies. Include the name and date of each seminar or class attended and

the name and date of publication of all works reviewed.

Response

Fundamentals of Utility Finance - January 2001 (Publication: Fundamentals of Utility Finance in a Restructured Environment binder) Training from Ron Bible, Financial Analysis Department Manager, and on-the-job experience since commencement of

employment in June 2000.

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

#### Respond Data Request

Data Request No.

0493

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Specialized Training

Description

Please describe all specialized training you have had in the use of the DCF (discounted cash flow) model. Include the name and date of each seminar or class attended and the name and date of

publication of all works reviewed.

Response

Fundamentals of Utility Finance – January 2001 Publication: "Fundamentals of Utility Finance in a Restructured Environment" Finance 333 - Investments (Winter 1994) Textbook: Bodie, Zvi; Kane, Alex; Marcus, Alan J. (1992) Essentials of Investments. Boston, MA: Irwin Finance 203 – Corporate Finance (Summer 1993) Textbook: Ross, Stephen A.; Westerfield, Randolph W.; Jordan, Bradford D. (1992 and 1993). Fundamentals of Corporate Finance (2nd ed.). Boston, MA: Irwin BAD-550 – Advanced Financial Management (Spring 2002) Textbook: Ross, Stephen A.; Westerfield, Randolph W.; Jordan, Bradford D. (2001). Essentials of

Corporate Finance (3rd ed.). New York, NY: McGraw-Hill Companies, Inc. Training from Ron Bible, Financial Analysis Department Manager, and on-the-job experience since

commencement of employment in June 2000.

**Objections** 

NA

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Security:

Public

Rationale:

NA

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# With Proprietary and Highly Confidential Data Requests a Protective Order must be on file.

Missouri Public Commission

# Respond Data Request

Data Request No.

0494

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Specialized Training

Description

Please describe all specialized training you have had in the area of rate of return and/or cost of capital for regulated electric utility companies. Include the name and date of each seminar or class attended and the name and date of publication of all works

reviewed.

Response

Fundamentals of Utility Finance - January 2001 (Publication: Fundamentals of Utility Finance in a Restructured Environment binder) Training from Ron Bible, Financial Analysis Department Manager, and on-the-job experience since commencement of

employment in June 2000.

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

Parcell, David C, The Cost of Capital - A Practitioner's Guide, 1997.

Formatted: Bullets and Numbering

-Read this book in the first month of employment with the Commission and have consistently referenced it during employment.

Morin, Roger A., <u>Regulatory Finance – Utilities' Cost of Capital</u>, Public Utilities Reports, Inc. 1994.

-Read this book in the first month of employment with the Commission and have consistently referenced it during employment.

Kolbe, Lawrence A.; James A. Read, Jr.; and George R. Hall, <u>The Cost of Capital</u> – Estimating the Rate of Return for Public <u>Utilities</u>

-Reviewed this book after the first couple of years of employment and have referenced it from time-to-time since then.

Bodie, Zvi; Kane, Alex; Marcus, Alan J. (1992) <u>Essentials of Investments.</u> Boston, MA: Irwin

-Read this book in the winter of 1994.

Ross, Stephen A.; Westerfield, Randolph W.; Jordan, Bradford D. (1992 and 1993). Fundamentals of Corporate Finance (2<sup>nd</sup> ed.). Boston, MA: Irwin

-Read this book in the summer of 1993.

Ross, Stephen A.; Westerfield, Randolph W.; Jordan, Bradford D. (2001). <u>Essentials of Corporate Finance</u> (3<sup>rd</sup> ed.). New York, NY: McGraw-Hill Companies, Inc.

-Read this book in the spring of 2002.

Madura, Jeff (1992). Financial Markets and Institutions (2<sup>nd</sup> ed.). St. Paul, MN: West Publishing Company.

-Read this boon in the summer of 1994,

Mr. Murray has read and reviewed many articles in the past four years concerning the various cost of capital models. These articles may have been in *Public Utilities Fortnightly*, on the internet, articles given to Mr. Murray or in general financial periodicals. The models used to determine cost of capital are used in general finance so it is impossible for Mr. Murray to recall all articles he has read. Mr. Murray probably has been exposed to these models in other textbooks during the pursuit of both his bachelor's and master's degrees, but to search each textbook for the discussion of these models is time consuming and unduly burdensome.

## **Respond Data Request**

Data Request No.

0495

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Reviewed

Description

Provide the title, publisher, and date of publication for each book, treatise, or other work you have read or reviewed on the subject of rate of return methodologies for regulated utilities. Also state the general time period in which you first read or reviewed each book,

treatise, or other work.

Response

See attachment

**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-2004-0570 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

#### **Respond Data Request**

Data Request No.

0496

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Reviewed

Description

Provide the title, publisher, and date of publication for each book, treatise, or other work you have read or reviewed on the subject of rate of return methodologies for regulated electric utilities. Also state the general time period in which you first read or reviewed

each book, treatise, or other work.

Response

See response to data request 0495.

**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-2004-0570 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

# **Respond Data Request**

Data Request No.

0497

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Teaching Experience

Description

State whether you have taught any courses, classes, or seminars — on any subject — at the college level. If so, state the name and address of the educational institution at which you taught and provide a description of each course, class, or seminar.

Response

Mr. Murray hasn't taught any college courses, classes or seminars

**Objections** 

NΑ

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-2004-0570 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

# Respond Data Request

Data Request No.

0498

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

**Teaching Experience** 

Description

State whether you have taught any courses, classes, or seminars – at any level – in the field of regulatory finance. If so, state the name and address of the educational institution at which you taught and

provide a description of each course, class, or seminar.

Response

Mr. Murray hasn't taught any "regulatory finance" courses, classes

or seminars.

**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-2004-0570 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

## **Respond Data Request**

Data Request No.

0499

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

**Teaching Experience** 

Description

State whether you have taught any courses, classes, or seminars — at any level — on the issues of rate of return and/or cost of capital. If so, state the name and address of the educational institution at which you taught and provide a description of each course, class, or permiser.

seminar

Response

Mr. Murray hasn't taught any courses, classes or seminars on rate

of return and/or cost of capital.

**Objections** 

NΙΔ

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-2004-0570 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:

NΑ

#### Respond Data Request

Data Request No.

0500

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Published

Description

State whether you have written or co-written any textbooks on any topic. If so, state the title, the name of the publisher, and the date of

publication for each.

Response

Mr. Murray hasn't written or co-written any textbooks.

**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-2004-0570 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

# Respond Data Request

Data Request No.

0501

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Published

Description

State whether you have written or co-written any books, treatises, or other works on the subject of regulatory finance. If so, state the title, the name of the publisher, and the date of publication for each.

Response

Mr. Murray hasn't written or co-written any books, treatises, or other

works on the subject of regulatory finance.

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-2004-0570 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

# **Respond Data Request**

Data Request No.

0502

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

**David Murray** 

Requested By **Brief Description**  Angela Cloven Works Published

Description

State whether you have written or co-written any books, treatises, or other works on the subject of rate of return and/or cost of capital.

If so, state the title, the name of the publisher, and the date of

publication for each.

Response

Mr. Murray hasn't written or co-written any books, treatises, or other

works on the subject of rate of return and/or cost of capital.

**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-2004-0570 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

# Respond Data Request

Data Request No.

0503

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Published

Description

State whether you have written or co-written any articles on the subject of regulatory finance. If so, state the title, the name of the

publisher (if any), and the date of publication for each.

Response

Mr. Murray hasn't written or co-written any articles on the subject of

regulatory finance.

**Objections** 

NA

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Security:

Public

Rationale:

NA

#### Respond Data Request

Data Request No.

0504

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Works Published

Description

State whether you have written or co-written any articles on any

subject. If so, state the title, the name of the publisher (if any), and

the date of publication for each.

Response

Mr. Murray hasn't written or co-written any articles on any subject.

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

# Respond Data Request

Data Request No.

0505

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

**Requested From** 

David Murray

Requested By

Angela Cloven

**Brief Description** 

Prior Testimony and Experience

Description

Please state the case caption (name, jurisdictional entity, case number) for each time you have provided expert testimony on a

regulatory finance issue.

Response

See revised Attachment A attached to Mr. Murray's rebuttal

testimony filed on November 4, 2004.

**Objections** 

NA

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Security:

**Public** 

Rationale:

NA

# Respond Data Request

Data Request No.

0506

Company Name

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Prior Testimony and Experience

Description

State the case caption (name, jurisdictional entity, case number) for

each regulated utility "rate case" in which you have been directly

involved and please describe your involvement in each.

Response

See revised Attachment A attached to Mr. Murray's rebuttal

testimony filed on November 4, 2004.

**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-2004-0570 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

# Respond Data Request

Data Request No.

0507

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Prior Testimony and Experience

Description

State the case caption (name, jurisdictional entity, case number) for each regulated electric utility "rate case" in which you have been

directly involved and please describe your involvement in each.

Response

See response to data request 0506.

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-2004-0570 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:

NΑ

#### Respond Data Request

Data Request No.

0508

**Company Name** 

MO PSC Staff-(All)

Case/Tracking No.

ER-2004-0570

**Date Requested** 

10/26/04

Issue

Rate of Return - Cost of Capital (Equity/Debt)

Requested From

David Murray

Requested By

Angela Cloven

**Brief Description** 

Prior Testimony and Experience

Description

State the date on which you first provided exert testimony before a

state utility commission such as the Missouri Public Service

Commission, and state the total number of times you have provided

expert testimony before a state utility commission.

Response

See response to 0508.

**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-2004-0570 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