

Exhibit No. 100

Exhibit No.:
Issue(s): *Winter Storm Uri,
Affiliate Transactions*
Witness: *Kimberly K. Bolin*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No(s): *EF-2022-0155*
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MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

AUDITING DEPARTMENT

REBUTTAL TESTIMONY

OF

KIMBERLY K. BOLIN

EVERGY MISSOURI WEST, INC.,

d/b/a EVERGY MISSOURI WEST

CASE NO. EF-2022-0155

Jefferson City, Missouri
June 2022

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REBUTTAL TESTIMONY OF
KIMBERLY K. BOLIN
EVERGY MISSOURI WEST, INC.,
d/b/a EVERGY MISSOURI WEST
CASE NO. EF-2022-0155**

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1 A. Yes, numerous times. Please refer to Schedule KKB-r1, attached to this
2 Rebuttal Testimony, for a list of the major audits in which I have assisted and filed testimony
3 with OPC and with the Commission.

4 Q. What knowledge, skills, experience, training and education do you have in the
5 areas of which you are testifying as an expert witness?

6 A. I have received continuous training at in-house and outside seminars on
7 technical ratemaking matters, both when employed by OPC and since I began my employment
8 at the Commission. I have been employed by this Commission or by OPC as a Regulatory
9 Auditor for over 25 years, and have submitted testimony on ratemaking matters numerous times
10 before the Commission. I have also been responsible for the supervision of other Commission
11 employees in rate cases and other regulatory proceedings.

12 **EXECUTIVE SUMMARY**

13 Q. What is the purpose of your rebuttal testimony?

14 A. In this testimony, I will address Evergy Missouri West, Inc. (“Evergy Missouri
15 West”) witness Ronald A. Klote’s direct testimony concerning the securitization request
16 regarding the Winter Storm Uri extraordinary costs. I also address Evergy Missouri West’s
17 witness Darrin R. Ives’ direct testimony concerning Evergy Missouri West’s request for a
18 waiver of the affiliate transaction rule regarding Evergy Missouri West and its securitization
19 affiliate.

1 **WINTER STORM URI**

2 Q. Does Staff believe that the costs incurred by Evergy Missouri West for Winter
3 Storm Uri should be securitized as allowed in RSMo. Section 393.1700 (the “Securitization
4 Statute”)?

5 A. Yes. Staff believes that the prudent costs incurred by Evergy Missouri West for
6 Winter Storm Uri are just, reasonable and in the public interest. Therefore, these extraordinary
7 costs qualify and should be recovered through the Securitization Statute.

8 Q. What amount of securitized costs has Evergy Missouri West requested?

9 A. Evergy Missouri West requested \$356,842,681 to be securitized. The following
10 table provides a breakdown of Evergy Missouri West’s securitized cost request:

11 **Table 1:**
12 **Evergy Missouri West’s Current Estimate of Storm Uri Bond Issuance Costs**

Description of Cost	Current Estimate
Fuel and Purchased Power	\$ 295,324,778*
Non-Fuel O&M	\$ 273,889*
Carrying Costs	\$54,604,083
Estimated Up-Front Financing Costs	\$6,639,931
Total	\$356,842,681

13 *Evergy applied a retail energy allocator of 99.62%

14 Q. Does Staff recommend any adjustments to the costs proposed by Evergy
15 Missouri West for Winter Storm Uri securitization?

16 A. Yes. Staff has proposed the following changes (with the Staff witness
17 responsible noted):

- 18 ○ Non-fuel Operations and Maintenance (O&M) Costs – Staff has removed all
19 non-fuel O&M costs. Staff believes these amounts will be recovered through

1 base rates established in Evergy Missouri West's current general rate case (Case
2 No. ER-2022-0130). (Bolin)

3 ○ Carrying Cost for Incurred Costs – Staff changed the proposed interest rate
4 from Evergy Missouri West's proposed pre-tax Weighted Average Cost of
5 Capital (WACC) of 8.9% to the long-term debt rate of 5.06% from Case No.
6 ER-2018-0146. (Bolin)

7 ○ FAC 95/5 Split – Removed 5% of incurred cost and associated carrying charges
8 based on the FAC 95/5 split. (Bolin and Fortson)

9 ○ Schedule SIL Adjustment - Disallowance related to the implementation of
10 Schedule SIL. (Luebbert)

11 ○ Revenues – Staff reduced the Winter Storm Uri securitization balance to reflect
12 an abnormally high level of revenues collected from customers by Evergy West
13 during the period of the storm. (Bolin)

14 ○ Estimated Upfront Financing Costs – Staff witness Mark Davis with Ducera
15 Partners, LLC calculated the estimated upfront financing costs based upon
16 Staff's proposed Winter Storm Uri costs to be recovered through securitization.
17 (Davis)

18 Q. What is Staff's current estimate for costs to be recovered by Evergy Missouri
19 West through the cost of bonds to be issued for Winter Storm Uri?

20 A. Staff's current estimate of costs to recover through the issuance of bonds for
21 Winter Storm Uri is \$302,808,277 as of January 31, 2023. As shown in Table 1 below, the
22 current estimate includes the costs incurred by Evergy Missouri West with the adjustments
23 explained above, as well as accrued carrying costs, deferred legal costs, and estimated up-front
24 financing costs for issuing the bonds. The estimated costs Staff recommends be included in the
25 bond financing are as follows:

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Table 2:
Staff's Current Estimate of Storm Uri Bond Issuance Costs

Description of Cost	Current Estimate
Fuel and Purchased Power	\$ 295,433,153+
95%/5% Sharing	\$ (14,771,658)+
Excess Revenues	\$ (8,612,108)*+
Schedule SIL Adjustment	\$ (1,435,315)*+
Accrued Carrying Costs	\$ 26,168,892
Estimated Up-Front Financing Costs	\$ 6,025,312
Total	\$ 302,808,277

*Staff applied the 95/5% ratio to determine these adjustment amounts.

+Staff applied the retail energy allocator

Q. Under normal circumstances would Evergy Missouri West include 95% of its fuel and purchased power costs in its Fuel Adjustment Clause ("FAC")?

A. Yes. However, due to the extraordinary amount of the fuel and purchased power it incurred in February 2021 due to Winter Storm Uri, Evergy Missouri West sought in Case No. EU-2021-0283 to defer 95% of the fuel and purchased power costs associated with this event and did not propose to include this amount in the FAC.

Q. What is an accounting authority order (AAO)?

A. An AAO is an accounting mechanism that permits deferral of costs from one period to another. The items deferred are booked as an asset rather than an expense, thus improving the financial picture of the utility in question during the deferral period. During a subsequent rate case, the Commission determines what portion, if any, of the deferred amounts will be recovered in rates

1 Q. What treatment of the Winter Storm Uri costs did Evergy Missouri West seek in
2 Case No. EU-2021-0283 regarding these costs?

3 A. Evergy Missouri West filed a request for an AAO in Case No. EU-2021-0283
4 seeking recovery of the amount excluded from the FAC and the additional following costs:

- 5 1) The remaining 5% of fuel and purchased power costs incurred due to
6 Winter Storm Uri in February 2021;
- 7 2) Non-fuel O&M expense related to maintaining utility facilities and
8 equipment, and;
- 9 3) Carrying costs at Evergy Missouri West's assumed weighted average cost
10 of capital of 7.358% plus applicable taxes.

11 Q. Did the Commission grant Evergy Missouri West's requested AAO for the
12 Winter Storm Uri costs?

13 A. No, Case No. EU-2021-0283 is still pending. Evergy Missouri West
14 ultimately will not need to defer any costs if this Commission issues a financing order in this
15 securitization case.

16 Q. If Evergy Missouri West is not allowed to securitize Winter Storm Uri costs and
17 is granted an AAO instead, how would Evergy Missouri West recover the costs?

18 A. In Evergy Missouri West's next general rate proceeding, Evergy Missouri West
19 would likely ask to recover the amounts deferred in customer rates. At that time, the
20 amortization period and final costs (including carrying costs) would be determined if the
21 recovery request is granted.

22 Q. What would be an appropriate amortization period for this deferral in the context
23 of AAO treatment?

1 A. Staff would probably recommend at least 15 years, due to the magnitude of
2 the costs.

3 Q. Would Staff recommend carrying costs be allowed as part of the amortization?

4 A. With amortization period being at least 15 years, Staff would possibly
5 recommend carrying costs be applied to the deferral, likely calculated at the applicable
6 long-term debt rate. The long-term debt rate is more appropriate to use than the weighted
7 average cost of capital (WACC) since this AAO would cover fuel and purchased power costs,
8 not capital costs normally included in rate base, such as plant. Also by using the long-term debt
9 rate instead of the WACC this would effectively provide a means of sharing between the
10 ratepayers and the shareholder of the extraordinary costs incurred. Using the WACC would
11 insulate Evergy Missouri West from the risk of an unanticipated event.

12 **Non-Fuel O&M Costs**

13 Q. What non-fuel O&M costs does Evergy Missouri West request to recover
14 through securitization?

15 A. Evergy is seeking to recover contractor costs, overtime for its employees and
16 associated payroll taxes, damage claims and additional materials and supplies.

17 Q. Does Staff agree these costs should be included in the securitized balance?

18 A. No. These costs have been included in Staff's normalized costs included in
19 Staff's cost of service in Evergy Missouri West's current rate case, Case No. ER-2022-0130,
20 and do not require additional treatment through the securitization request.

1 **95/5% Split**

2 Q. Would Staff recommend recovery of the 5% of the fuel and purchased power in
3 rates subsequent to an AAO?

4 A. No. If Evergy Missouri West were granted an AAO covering 100% of the costs
5 instead of securitization for the entirety of the Winter Storm Uri costs, in a future rate
6 proceeding Staff would likely recommend that only 95% of the deferred fuel and purchased
7 power costs be allowed recovery in rates. Staff believes that by not allowing the 5% of the fuel
8 and purchased power costs that this reflects an appropriate “sharing” the financial impact of
9 Winter Storm Uri.

10 Q. Why should extraordinary costs associated with “acts of God,” such as Winter
11 Storm Uri, be “shared” between ratepayers and shareholders?

12 A. The risk of extraordinary unforeseen events should not be borne by the
13 customers entirely. To do this would insulate the utility from all risk of an unanticipated event
14 such as a natural disaster.

15 Q. Has the Commission reflected the “sharing” of the financial impact of natural
16 disaster extraordinary events in the past?

17 A. Yes. In Case No. WR-95-145 involving St. Louis County Water Company’s
18 (SLCWC) unamortized flood deferrals (SLCWC is now part of Missouri-American Water
19 Company), the Commission noted that including the unamortized balance in rate base would
20 shield the shareholders from the risk of a natural disaster while imposing the risk entirely on
21 the ratepayers. The Commission opined in that case that allowing SLCWC to recover the cost
22 through amortization without including the unamortized balance in rate base allowed both the
23 ratepayers and the shareholders to share in the risk. This regulatory treatment has been

1 commonly accepted by the Commission for other AAOs associated with natural disasters.
2 In this case, which is not an AAO application, excluding the 5% of fuel and purchased power
3 costs from the securitization request will effectively “share” the impact of Winter Storm Uri
4 between Liberty and its customers.

5 Q. Are other Staff witnesses also addressing rate treatment for the 5% of fuel and
6 purchased power costs in this case?

7 A. Yes. Please also refer to Brad J. Fortson’s rebuttal testimony in this case
8 detailing how the 5% of Winter Storm Uri fuel and purchased power costs would not be
9 included in customer rates through the FAC if Evergy Missouri West had sought normal
10 regulatory treatment of the storm costs under that rate mechanism.

11 Q. How does Staff recommend that Evergy Missouri West account for differences
12 between the qualified extraordinary costs approved for securitization in this case, if any, with
13 the actual qualified extraordinary costs incurred by Evergy Missouri West once all current and
14 future Winter Storm Uri extraordinary costs and revenues are known and measurable?

15 A. Staff recommends these differences (both amounts reflecting a 95/5 split) be
16 accounted for consistent with the Securitization Statute. Sections 2. (1)(g) and 2. (3)(c)k of the
17 Statute require a future ratemaking process to reconcile any differences between the costs
18 securitized by the utility tariff bonds and the final securitized costs incurred by the electrical
19 corporation be reconciled. Staff recommends that Evergy Missouri West be ordered to track
20 any additional expenses or revenues incurred in regard to Winter Storm Uri and include these
21 amounts in a regulatory asset or liability for future recovery or return to the ratepayers in a
22 general rate proceeding.

1 Q. Would such a subsequent ratemaking mechanism affect the amount of
2 securitized utility bond charges paid by customers?

3 A. No.

4 **Carrying Costs**

5 Q. What interest rate did Evergy Missouri West use in calculating the carrying costs
6 associated with the expenses Evergy Missouri West incurred for Winter Storm Uri?

7 A. Evergy Missouri West witness Mr. Klote in his direct testimony on page 14,
8 lines 3-9 stated Evergy Missouri West used a WACC of 8.9%.

9 Q. Does Staff agree with Evergy Missouri West's use of the WACC from Case No.
10 ER-2018-0146 of 8.9% to calculate Evergy Missouri West's carrying costs associated with the
11 costs incurred for Winter Storm Uri?

12 A. No. In Staff's opinion, using the WACC of 8.9% is not appropriate for
13 calculating these carrying costs. If Evergy Missouri West had sought recovery of these costs in
14 the FAC case as is normally done, the carrying costs would have been calculated based on FAC
15 monthly variable short-term debt rates for the first six months and then due to Evergy Missouri
16 West's election of Plant in Service Accounting (PISA) the remaining balance over the three
17 percent compounded annual growth rate would be deferred and recovered over 20 years at the
18 WACC in base rates. If Evergy Missouri West had sought recovery of these costs through an
19 AAO, Staff would possibly recommend carrying costs be applied to the deferral, likely
20 calculated at the applicable long-term debt rate for reasons I stated earlier.

21 Q. Was the WACC of 8.9% ordered by the Commission in ER-2018-0146?

22 A. No. The WACC issue was an item that was settled without parties agreeing to
23 a specific rate. The 8.9% was Staff's recommended pre-tax WACC in that case.

1 Q. Why is Staff not using the short-term debt rate to calculate the carrying costs in
2 this case?

3 A. Due to the length of time elapsed since Winter Storm Uri (over a year), Staff's
4 position is that Evergy Missouri West's long-term debt rate is more appropriate to use than the
5 short-term debt rate.

6 **Estimated Upfront Financing Costs**

7 Q. What did Evergy Missouri West include for up-front financing costs associated
8 with securitizing the costs Evergy Missouri West incurred for Winter Storm Uri?

9 A. Evergy Missouri West witness Jason Humphrey in his direct testimony on
10 page 3, lines 18 through page 4 line 4 stated as follows:

11 Up-front financing costs, which will be financed from the proceeds
12 of the Securitization Bonds, include the fees and expenses to obtain the
13 Financing Order, as well as the fees and expenses associated with the
14 structuring, marketing and issuance of each series of Securitization Bonds,
15 including: external legal fees, structuring advisory fees and expenses,
16 underwriting fees (including underwriters' counsel) and original issue
17 discount, rating agency and trustee fees (including trustee's counsel),
18 accounting and auditing fees, information technology programming costs,
19 SPE independent director and manager fees, servicer's set-up costs,
20 printing and marketing expenses, stock exchange listing fees and
21 compliance fees filing and registration fees, and the costs of outside
22 consultant(s) and counsel, if any, retained by the Commission or the Staff.

23 Evergy Missouri West's estimated upfront costs are approximately \$6.6 million.

24 Q. What is Staff's calculation of the current estimated up-front financing costs?

25 A. Staff included \$6,025,312 for the current estimated up-front financing costs.
26 Staff witness Mark Davis or Ducera Partners, LLC provides an explanation as to how Staff
27 calculated the estimated up-front financing costs.

1 Q. What interest rate is Staff assuming regarding the Winter Storm Uri
2 securitization bonds at this time?

3 A. Based on the analysis provided by Staff witness Mark Davis of Ducera Partners,
4 LLC Staff's position assumes a range of securitization interest rates rather than relying on a rate
5 that is subject to change. Interest rates utilized by Staff consider an observed increase of
6 approximately 125-140 basis points (bps) in the benchmark treasury rates utilized in Evergy
7 Missouri West witness Steffen Lunde's testimony. A narrowed range of implied net present
8 value (NPV) savings is illustrated assuming a range of 4.5% to 5.0% cost of securitization,
9 considering Evergy Missouri West's estimate of 3.43% adjusted for such observed movements
10 in treasuries in the last few months.

11 Q. What term of securitization is Staff assuming regarding the Winter Storm Uri
12 securitization bonds at this time?

13 A. Based on the analysis provided by Staff witness Mark Davis of Ducera Partners,
14 LLC Staff's analysis uses a recovery period for the bonds of 15 to 20 years. Staff believes a
15 5% interest rate and a 15 to 20 year term of securitization is reasonable and the most beneficial
16 to the customers.

17 **Excess Revenues**

18 Q. Why is it appropriate to make the adjustment to remove excess revenues from
19 the Winter Storm Uri securitization balance?

20 A. Winter Storm Uri was a unique, unusual and non-recurring event and those
21 extraordinary costs under Staff's recommendation would be recovered through the
22 securitization process. However, there was also a material amount of additional (excess)
23 revenues received by Evergy Missouri West during this extraordinary event. Evergy Missouri

1 West has already received the benefit of these revenues and that gain to Evergy Missouri West
2 resulting directly from Winter Storm Uri should be offset against the securitization costs. Staff
3 calculated the excess revenues the same way that Evergy Missouri West calculated
4 extraordinary fuel costs by calculating a three-year average baseline of revenues received from
5 retail customers and comparing the February 2021 retail revenues to the baseline. Staff
6 considers the amount of February 2021 retail revenues that exceeded the three-year average as
7 excess revenues and has offset the securitized balance of fuel and purchased power costs by
8 \$8,612,108.

9 **Benefit of Securitization**

10 Q. What ratemaking methods did Staff and Evergy Missouri West use to compare
11 the benefit of recovering Winter Storm Uri cost through securitization?

12 A. Staff compared recovering Winter Storm Uri costs through the FAC and through
13 an AAO. These two ratemaking options are the traditional methods in which Evergy Missouri
14 West would have recovered Winter Storm Uri costs.

15 Q. Does Evergy Missouri West believe customers will receive savings/benefits by
16 securitizing the Winter Storm Uri costs?

17 A. Yes. Evergy Missouri West witness Ronald A. Klote states in his direct
18 testimony on page 14, lines 12 through 20 that the customer will receive a cost savings/benefits
19 of \$64.5 million (net present value) in contrast to the costs being recovered through the FAC
20 and \$121.3 million (net present value) in savings when compared to the costs being recovered
21 through an AAO.

22 Q. Does Staff agree with the amounts Evergy Missouri West's calculated regarding
23 the savings/benefits of securitizing Winter Storm Uri costs?

1 A. No. Based on the analysis provided by Staff's consultant and witness in this
2 case, Mark Davis, Staff's recommended level of savings/benefits due to securitization is
3 \$55.6 million (net present value) by securitizing Winter Storm Uri costs instead of recovering
4 the amounts through the FAC and \$11.5 million (net present value) when compared to recovery
5 through the AAO.

6 **AFFILIATE TRANSACTIONS**

7 Q. On page 18 of Evergy Missouri West's witness Darrin R. Ives' direct testimony
8 he claims that Evergy Missouri West does not believe the Special Purpose Entity ("SPE") is an
9 affiliate of Evergy Missouri West, and, that in any event, a waiver should be granted to the
10 Commission's Affiliate Transactions Rule regarding transactions between the utility and the
11 SPE. Does Staff agree?

12 A. Staff is still reviewing information regarding the applicability of the Affiliate
13 Transaction Rule to the proposed securitization transaction. At this time, Staff is not sure a
14 waiver of the affiliate transaction rules is appropriate or even necessary in the context of
15 securitization. Staff will update its position later as appropriate.

16 Q. Does this conclude your rebuttal testimony?

17 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Evergy)
Missouri West, Inc. d/b/a Evergy Missouri) Case No. EF-2022-0155
West for a Financing Order Authorizing the)
Financing of Extraordinary Storm Costs)
Through an Issuance of Securitized Utility)
Tariff Bonds)

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

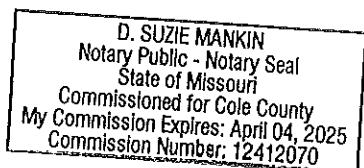
COMES NOW KIMBERLY K. BOLIN and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Kimberly K. Bolin*; and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.


KIMBERLY 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 27th day of June 2022.




Notary Public

**CASE PARTICIPATION
OF
KIMBERLY K. BOLIN**

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Evergy Missouri	ER-2022-0129/ER-2022-0130	<u>Direct</u> – COVID AAO, Winter Storm Uri Jurisdictional Allocations	Pending
The Empire District Electric Company	EO-2022-0040/EO-2022-0193	<u>Rebuttal</u> – ADIT and EADIT, Sharing of Costs, Decommissioning Costs, Winter Storm Uri AAO, Interest Earned on Capital Subaccount <u>Surrebuttal</u> – Asbury Environmental Asset/ARO, ADIT and EADIT	Pending
Ozarks Medical Center vs. Summit Natural Gas of Missouri, Inc.	GC-2022-0158	<u>Rebuttal</u> – Accounting Authority Order	Pending
The Empire District Gas Company	GR-2021-0320	<u>Direct</u> – Excess ADIT and Tax Tracker	Settled
The Empire District Electric Company	EU-2021-0274	<u>Rebuttal</u> – Winter Storm Uri AAO	Pending
The Empire District Electric Company	ER-2021-0312	<u>Cost of Service Report</u> – ARO, Amortization of Excess ADIT, Regulatory Lag and Risk Mitigation <u>Rebuttal</u> – Business Risk, Paygo, AROs, Transmission Tracker <u>Surrebuttal</u> - Non-FAC Wind Revenues, ADIT and Excess ADIT, Iatan/PCB Environmental Costs, Market Price Protection Mechanism, Winter Storm Uri	Settled
Ameren Missouri	ER-2021-0240	<u>Cost of Service Report</u> – COVID-19 AAO 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	<u>Cost of Service Report</u> - COVID-19 AAO Cost Recovery, AMI-Software, Allocation Factors <u>Surrebuttal</u> – Normalization of COVID-19 Costs, AMI Software	Settled

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<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Evergy Missouri Metro and Evergy Missouri West	ET-2021-0151	<u>Rebuttal Report</u> – Accounting	Contested
Spire Missouri	GR-2021-0108	<u>Cost of Service Report</u> – COVID-19 AAO Recovery <u>Surrebuttal</u> – Trackers	Settled
Missouri-American Water Company	WR-2020-0344	<u>Cost of Service Report</u> – Future Test Year, 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	Settled
Spire Missouri, Inc.	GU-2020-0376	<u>Rebuttal</u> – Accounting Authority Order, Lost Revenues	Settled
Evergy Metro, Inc., d/b/a Evergy Missouri Metro and Evergy Missouri West, Inc. d/b/a Evergy Missouri West	EU-2020-0350	<u>Rebuttal</u> – Accounting Authority Order, Lost Revenue, Carrying Costs	Contested
Empire District Electric Company	ER-2020-0311	<u>Rebuttal</u> – Coal Inventory Adjustment <u>Surrebuttal</u> – Coal Inventory Adjustment	Settled

**CASE PARTICIPATION
OF
KIMBERLY K. BOLIN**

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Empire District Electric Company	ER-2019-0374	<p><u>Direct</u> – Overview of Staff’s Filing <u>Cost of Service Report</u> – 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 <u>Supplemental</u> – Jurisdictional Allocations, Rate Case Expense, Management Expense, Pension and OPEBs, Affiliate Transactions, Software Maintenance</p>	Contested
Confluence Rivers Utility Operating Co., Inc.	WA-2019-0299	<p><u>Surrebuttal</u> – Quality of Service <u>Direct</u> – Net Book Value of Plant</p>	Contested
Osage Utility Operating Co., Inc.	WA-2019-0185	<u>Surrebuttal</u> – Rate Base, Acquisition Incentive	Contested
Spire Inc.	GO-2019-0115 and GO-2019-116	<u>Staff Direct Report</u> – Blanket Work Orders and Current Income Taxes	Contested
Empire District Electric Company and Liberty Utilities	AO-2018-0179	<p><u>Direct</u> – Moneypool <u>Surrebuttal</u> - Moneypool</p>	Contested
Confluence Rivers Utility Operating Company, Inc.	WM-2018-0116 and SM-2018-0117	<u>Direct</u> – Rate Base, Roy L Utilities	Settled
Spire Missouri Inc.	GO-2016-0332, GO-2016-0333, GO-2017-0201, GO-2017-0202 GO-2018-0309 and GO-2018-0310	<u>Direct</u> – Removal of Plastic Main and Service Line Replacement Costs	Contested

**CASE PARTICIPATION
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KIMBERLY K. BOLIN**

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri-American Water Company	WR-2017-0285	<u>Cost of Service Report</u> – Pension/OPEB 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	Settled
Missouri-American Water Company	WO-2018-0059	<u>Direct</u> – ISRS Overview, Accumulated Deferred Income Taxes, Reconciliation	
Missouri Gas Energy and Laclede Gas Company	GO-2016-0332 and GO-2016-0333	<u>Rebuttal</u> – Inclusion of Plastic Main and Service Line Replacements	Contested
Empire District Electric Company/Liberty Utilities	EM-2016-0213	<u>Rebuttal</u> – Overview of Transaction, Ratemaking /Accounting Conditions, Access to Records <u>Surrebuttal</u> – OPC Recommended Conditions, SERP	Settled
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	<u>Direct</u> – Partial Disposition Agreement	Contested
Empire District Electric Company	ER-2016-0023	<u>Requirement Report</u> – Riverton Conversion Project and Asbury Air Quality Control System <u>Direct</u> – Overview of Staff’s Revenue Requirement Report and Overview of Staff’s Rate Design Filing	Settled
Missouri-American Water Company	WR-2015-0301	<u>Report on Cost of Service</u> – Corporate Allocation, District Allocations <u>Rebuttal</u> – District Allocations, Business Transformation <u>Surrebuttal</u> – District Allocations, Business Transformation, Service Company Costs	Settled
Empire District Electric Company	ER-2014-0351	<u>Direct</u> – Overview of Staff’s Filing <u>Rebuttal</u> - ITC Over-Collection, Cost of Removal Deferred Tax Amortization, State Flow-Through <u>Surrebuttal</u> – Unamortized Balance of Joplin Tornado, ITC Over-Collections, Cost of Removal Deferred Tax Amortization, State Flow-Through, Transmission Revenues and Expenses	Settled

**CASE PARTICIPATION
OF
KIMBERLY K. BOLIN**

<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
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	<u>Direct</u> – Overview of Staff’s Filing <u>Report on Cost of Service</u> – True-Up, Availability Fees, Sewer Operating Expense, Sewer Equipment Maintenance Expense <u>Surrebuttal</u> – Availability Fees <u>True-Up Direct</u> – Overview of True-Up Audit <u>True-Up Rebuttal</u> – Corrections to True- Up	Contested
Empire District Electric Company	ER-2012-0345	<u>Direct</u> - Overview of Staff’s Filing <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 <u>Rebuttal</u> – Unamortized Balance of Joplin Tornado AAO, Rate Case Expense, True- Up and Uncontested Issues <u>Surrebuttal</u> – Unamortized Balance of Joplin Tornado AAO, SPP Transmission Expense, True-Up, Advanced Coal Investment Tax Credit	Settled
Missouri-American Water Company	WR-2011-0337	<u>Direct</u> – Overview of Staff’s Filing <u>Report on Cost of Service</u> - True-Up Recommendation, Tank Painting Tracker, Tank Painting Expense <u>Rebuttal</u> - Tank Painting Expense, Business Transformation <u>Surrebuttal</u> – Tank Painting Tracker, Acquisition Adjustment	Settled

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<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
Missouri-American Water Company	WR-2010-0131	<u>Report on Cost of Service</u> - Pension/OPEB Tracker, Tank Painting 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 Income Tax Expense	Settled
Empire District Gas Company	GR-2009-0434	<u>Report on Cost of Service</u> – Prepaid 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	Settled
Laclede Gas Company	GT-2009-0056	<u>Surrebuttal Testimony</u> – Tariff	Contested
Missouri-American Water Company	WR-2008-0311 & SR-2008-0312	<u>Report on Cost of Service</u> – Tank Painting Tracker, Lobbying Costs, PSC Assessment <u>Direct</u> – Overview of Staff’s Filing <u>Rebuttal</u> – True-Up Items, Unamortized Balance of Security AAO, Tank Painting Expense, Fire Hydrant Painting Expense <u>Surrebuttal</u> – Unamortized Balance of Security AAO, Cedar Hill Waste Water Plant, Tank Painting Expense, Fire Hydrant Painting Expense	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

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Kansas City Power and Light Company	ER-2006-0314	<p><u>Direct</u>- 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</p> <p><u>Surrebuttal</u>- Uncollectible (Bad Debt) Expense, Payroll, A&G Salaries Capitalization Ratio, Other Employee Benefits</p>	Contested
Missouri Gas Energy	GR-2006-0204	<p><u>Direct</u>- Payroll, Incentive Compensation, Payroll Taxes, Employee Benefits, Lobbying, Customer & Governmental Relations Department, Collections Contract</p>	Settled

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<u>Company Name</u>	<u>Case Number</u>	<u>Testimony/Issues</u>	<u>Contested or Settled</u>
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	<u>Direct</u> - Acquisition Premium	Settled
Missouri Gas Energy	GR-2004-0209	<u>Direct</u> - Safety Line Replacement Program; Environmental Response Fund; Dues & Donations; Payroll; Customer & Governmental Relations Department Disallowance; Outside Lobbyist Costs <u>Rebuttal</u> - 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	<u>Direct</u> - 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

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Laclede Gas Company	GR-2002-356	<u>Direct</u> - 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>Surrebuttal</u> - Payroll	Settled
Osage Water Company	SR-2000-556/ WR-2000-557	<u>Direct</u> - Customer Service	Contested

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St. Louis County Water Company	WR-2000-844	<u>Direct</u> - Main Incident Expense	Settled
Missouri American Water Company	WR-2000-281/ SR-2000-282	<u>Direct</u> - Water Plant Premature Retirement; Rate Case Expense <u>Rebuttal</u> - Water Plant Premature Retirement <u>Surrebuttal</u> - Water Plant Premature Retirement	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	<u>Direct</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <u>Rebuttal</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs <u>Surrebuttal</u> - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs	Settled
Laclede Gas Company	GR-98-374	<u>Direct</u> - 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

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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	<u>Direct</u> - 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	<u>Direct</u> - Acquisition Adjustment; Interest Rates for Customer Deposits <u>Rebuttal</u> - Acquisition Adjustment; Interest Rates for Customer Deposits <u>Surrebuttal</u> - Interest Rates for Customer Deposits	Contested
Missouri-American Water Company	WA-97-45	<u>Rebuttal</u> - Waiver of Service Connection Charges	Contested
Imperial Utility Corporation	SC-96-427	<u>Direct</u> - Revenues, CIAC <u>Surrebuttal</u> - Payroll; Uncollectible Accounts Expense; Rate Case Expense, Revenues	Settled
St. Louis Water Company	WR-96-263	<u>Direct</u> -Main Incident Repairs <u>Rebuttal</u> - Main Incident Repairs <u>Surrebuttal</u> - Main Incident Repairs	Contested
Steelville Telephone Company	TR-96-123	<u>Direct</u> - Depreciation Reserve Deficiency	Settled

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Missouri-American Water Company	WR-95-205/ SR-95-206	<u>Direct</u> - Property Held for Future Use; Premature Retirement of Sewer Plant; Depreciation Study Expense; Deferred Maintenance <u>Rebuttal</u> - Property Held for Future Use; Premature Retirement of Sewer Plant; Deferred Maintenance <u>Surrebuttal</u> - 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