Exhibit No.: Issue(s): Short-term debt Witness: Kimberly K. Bolin Sponsoring Party: MoPSC Staff Type of Exhibit: Direct Testimony Case No.: GR-2025-0107 Date Testimony Prepared: April 23, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL AND BUSINESS ANALYSIS DIVISION

DIRECT TESTIMONY

OF

KIMBERLY K. BOLIN

SPIRE MISSOURI INC., d/b/a Spire

CASE NO. GR-2025-0107

Jefferson City, Missouri April 202

** Denotes Confidential Information **

1		DIRECT TESTIMONY
2		OF
3		KIMBERLY K. BOLIN
4 5		SPIRE MISSOURI INC., d/b/a Spire
6		CASE NO. GR-2025-0107
7	Q.	Please state your name and business address.
8	А.	My name is Kimberly K. Bolin. My business address is P.O. Box 260,
9	Suite 440, Je	fferson City, MO 65012.
10	Q.	By whom are your employed and in what capacity?
11	А.	I am the Director of the Financial and Business Analysis Division for the
12	Missouri Pub	lic Service Commission ("Commission").
13	Q.	Please describe your educational background and work experience.
14	A.	I graduated from Central Missouri State University (now University of Central
15	Missouri) in	Warrensburg, Missouri with a Bachelor of Science in Business Administration,
16	major empha	sis in Accounting, in May 1993. Before coming to work at the Commission, I was
17	employed by	the Missouri Office of the Public Counsel ("OPC") as a Public Utility Accountant
18	from Septem	ber 1994 to April 2005. I commenced employment with the Commission in
19	April 2005.	
20	Q.	What was the nature of your job duties when you were employed by OPC?
21	А.	I was responsible for performing audits and examinations of the books and
22	records of pu	blic utilities operating within the state of Missouri.
23	Q.	Have you previously filed testimony before the Commission?
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Yes, numerous times. Please refer to Schedule KKB-d1, attached to this Direct 1 A. 2 Testimony, for a list of the major audits in which I have assisted and filed testimony with OPC 3 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? A. I have received continuous training at in-house and outside seminars on 6 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 Q. What is the purpose of your direct testimony? 13 I am providing an analysis of Spire Missouri Inc., d/b/a Spire's ("Spire A. 14 Missouri") recent use of short-term debt to finance short-term assets. 15 Q. What is the definition of short-term assets? 16 A. Short-term assets, or securities in investments refer to assets that are held for 17 less than one year. In accounting, the term "current" refers to a short-term asset, which means, 18 expected to be converted into cash in less than one year, or a short-term liability, coming due 19 in less than one year. 20 What is the definition of short-term debt? Q. 21 A. Short-term debt is any debt that a company is obligated to repay within one year, 22 or the current fiscal year. Short-term debt is often used by utilities to finance construction until 23 it is replaced with long-term financing.

1	Q.	In Spire Missouri's last rate case, Case No. GR-2022-0179, did the signatories
2	reach a Full	Unanimous Stipulation and Agreement in which the inclusion of short-term debt
3	in Spire Miss	souri's capital structure was not addressed?
4	А.	Yes. The Stipulation and Agreement was silent as to whether the revenue
5	requirement	included a capital structure that contained short-term debt.
6	Q.	Did the Commission order that short-term debt should be included in Spire
7	Missouri's ca	apital structure in the Spire Missouri rate case, Case No. GR-2021-0108?
8	А,	Yes. In Case No. GR-2021-0108, the Commission determined that short-term
9	debt should b	be included in Spire Missouri's ratemaking capital structure.
10	Q.	As part of the Amended Report and Order in that case, did the Commission
11	determine that	at the short-term assets (gas costs) and the short-term debt related to Winter Storm
12	Uri should b	e removed from both balances to determine if the short-term assets exceed the
13	short-term de	ebt?
14	А.	Yes. The Commission stated in its Amended Report and Order issued on
15	November 12	2, 2021:
16 17 18 19 20 21 22 23 24 25 26 27		The Commission finds that the appropriate capital structure to use for ratemaking purposes is that of Spire Missouri, modified to address the inclusion of short-term debt. The Commission finds that Spire Missouri's short-term debt is being used to finance long-term assets. Therefore, it is appropriate to include short-term debt in the capital structure of Spire Missouri used for ratemaking. However, the average short-term debt amount presented by OPC, which is the 13-month average short-term debt in excess of short-term assets, included both short-term assets and short-term debt associated with Winter Storm Uri. The Commission finds that it is not appropriate to include short-term assets and short-term debt associated with Winter Storm Uri in the capital structure.
28	Q.	Does the analysis Staff performed for this case remove short-term assets and
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1	А.	Yes. Staff removed the short-term assets associated with Winter Storm Uri.
2	There was no	short-term debt associated with Winter Storm Uri included in the test year ending
3	September 30	0, 2024, or the update period ending December 31, 2024.
4	Q.	What items did Staff include as short-term assets in its analysis?
5	А.	Staff included gas costs, Construction Work in Progress ("CWIP") and any
6	regulatory as	sets or liabilities associated with the Weather Normalization Adjustment Rider
7	("WNAR").	Staff's analysis is consistent with the analysis used by the Commission in Case
8	No. GR-2017	7-0215/0216 and in Case No. GR-2021-0108. This analysis is also consistent with
9	Staff's analys	sis in the most recent Spire Missouri rate case, Case No. GR-2022-0179.
10	Q.	What items did Staff not include in its analysis?
11	А.	Staff did not include accounts receivable, accounts payable and regulatory assets
12	and liabilities	s except for the WNAR regulatory assets and liabilities.
13	Q.	Why did Staff exclude accounts receivable and accounts payable?
14	А.	Staff includes in rate base an item called "cash working capital" ("CWC").
15	Cash working	g capital is the amount of funding necessary for a utility to pay day-to-day expenses
16	incurred in p	roviding the utility services to its customers. The cash flow impact of payments
17	received by a	a company (accounts receivable) and the cash outflow impact of expenses paid by
18	a company (a	accounts payable) are analyzed for cash working capital purposes using a lead/lag
19	study. The re	evenue lag is the amount of time between the day the company provides the utility
20	service and th	he day it receives payment from the ratepayers for that service. Therefore, accounts
21	receivable is	reflected in the calculation of CWC and thereby receives a return equal to the
22	utility's weig	hted average cost of capital like all other rate base items. Accounts payable is also
23	included in th	ne CWC through the expense lag, which measures the number of days between the

1	receipt of, an	d payment for, the goods and services (i.e., cash expenditures) used to provide
2	service to the	ratepayers. Given this, there is no reason to assume that accounts receivable and
3	accounts paya	ble are financed with short-term debt for ratemaking purposes.
4	Q.	Why did Staff exclude the regulatory assets and liabilities (other than those
5	associated with	th the WNAR)?
6	А.	Except for the WNAR regulatory assets and liabilities, these are not short-term
7	assets or liabi	lities in that they are typically held for longer than one year. Staff's position is
8	that only true	e short-term assets should be considered in an analysis of Spire Missouri's
9	short-term de	bt financing needs.
10	Q.	What does Staff's analysis show as of the end of the update period,
11	December 31	, 2024?
12	А.	Staff's update period analysis ending December 31, 2024, attached as
13	Schedule KK	B-d2, shows that the 13-month average of short-term debt exceed the 13-month
14	average balan	ce of short-term assets in the amount of ** **.
15	Q.	Does Staff recommend that the amount of short-term debt that exceeds
16	short-term ass	sets should be included in Spire Missouri's capital structure?
17	А.	Not at this time. Staff will continue to examine the amount of short-term assets
18	and short-tern	n debt through the true-up period ending May 31, 2025, and may revise its position
19	on the short-to	erm debt in capital structure based upon the new data, if appropriate.
20	Q.	Does this conclude your direct testimony?
21	А.	Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of Spire Missouri Inc. d/b/a Spire's Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas

Case No. GR-2025-0107

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 *Direct 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.

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 164 day of April 2025.

millankin Notary Public /

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2029 Commission Number: 12412070

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Missouri-American	WR-2024-0320	Direct/Rebuttal – Tracker Policy, True-up,	Pending
Water Company		Discrete Adjustments, Depreciation and	Settlement
1 2		Carrying Costs Deferral	
		Cross-Surrebuttal – Depreciation and	
		Carrying Costs Deferral	
Ameren Missouri	EA-2024-0237	Rebuttal – Overview of Staff's Filing	Settled
Confluence Rivers	WR-2023-0006	<u>Direct</u> – Income Taxes	Contested
Utility Operating		<u>Surrebuttal</u> – Income Taxes	
Company			
Missouri-American	WR-2022-0303	<u>Direct</u> – COVID 19 AAO Amortization,	Contested
Water Company		Test Year/True-Up/Discrete Adjustments	
		<u>Rebuttal</u> - Bad Debt Tracker, Production	
		Cost Tracker, Property Tax Tracker,	
		Discrete Adjustments, Depreciation and	
		Carrying Cost Deferral, Affiliate	
		Transactions Rules	
		Surrebuttal - Depreciation and Carrying	
	CD 2022 0170	Costs Deferral, Discrete Adjustments	G (11)
Spire Missouri	GR-2022-0179	Direct – Short-term debt	Settlement
Erroner Missouri West	EF-2022-0155	Rebuttal – Short-term debt	Contested
Evergy Missouri West	ЕГ-2022-0133	<u>Rebuttal</u> – Winter Storm Uri, Affiliate Transactions	Contested
		Surrebuttal – Winter Storm Uri, Affiliate	
		Transactions, Tax Savings	
Evergy Missouri	ER-2022-	<u>Direct</u> – COVID AAO, Winter Storm Uri	Settled
	0129/ER-2022-	Jurisdictional Allocations	Settled
	0120/ERC 2022	<u>Rebuttal</u> - Trackers	
	0120	Surrebuttal – Winter Storm Uri	
		Jurisdictional Allocations	
The Empire District	EO-2022-	<u>Rebuttal</u> – ADIT and EADIT, Sharing of	Contested
Electric Company	0040/EO-2022-	Costs, Decommissioning Costs, Winter	
	0193	Storm Uri AAO, Interest Earned on Capital	
		Subaccount	
		Surrebuttal – Asbury Environmental	
	00.0000.0150	Asset/ARO, ADIT and EADIT	
Ozarks Medical Center	GC-2022-0158	<u>Rebuttal</u> – Accounting Authority Order	Contested
vs. Summit Natural			
Gas of Missouri, Inc.			

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

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
Missouri-American Water Company	WR-2020-0344	Cost of Service Report – 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	Rebuttal – 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	Rebuttal – 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
Empire District Electric Company	ER-2019-0374	Direct– Overview of Staff's FilingCost of Service Report– ExecutiveOverview, Test year/True-Up Period,Vegetation Management TrackerRegulatory Asset, Iatan and Plum PointCarrying Costs, Stub Period TaxCut/Removal of Tax Impact, Tornado AAO,Rate Case Expense Sharing, Credit CardFees, Clearing AccountsRebuttalAAO and Tracker Policy, AffiliateTransactionsSurrebuttal/True-UpPuttal/True-UpBalance of Joplin AAO, Credit Card Fees,Payroll Test year, Rate Case ExpenseSharing, LED Lighting, Low-Income PilotProgram Amortization, AffiliateTransactionsSupplemental– Jurisdictional Allocations,Rate Case Expense, Management Expense,Pension and OPEBs, Affiliate Transactions,Software Maintenance	Contested

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
Confluence Rivers Utility Operating Co., Inc.	WA-2019-0299	<u>Surrebuttal</u> – Quality of Service <u>Direct</u> – Net Book Value of Plant	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	Staff Direct Report – Blanket Work Orders and Current Income Taxes	Contested
Empire District Electric Company and Liberty Utilities	AO-2018-0179	<u>Direct</u> – Moneypool <u>Surrebuttal</u> - Moneypool	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
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	Rebuttal– Overview of Transaction,Ratemaking /Accounting Conditions,Access to RecordsSurrebuttal– OPC RecommendedConditions, SERP	Settled
Hillcrest Utility Operating Company, Inc.	WR-2016-0064	<u>Direct</u> – Partial Disposition Agreement	Contested

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

Company Name	Case Number	Testimony/Issues	Contested
			or Settled
Empire District Electric Company	ER-2012-0345	Direct-Overview of Staff's FilingReport on Cost of ServiceSWPA HydroReimbursement, Joplin Tornado AAOAsset, SPP Revenues, SPP Expenses,Regulatory Plan Amortization Impacts,SWPA Amortization, Tornado AAOAmortizationRebuttalUnamortized Balance of JoplinTornado AAO, Rate Case Expense, True-Up and Uncontested IssuesSurrebuttalUnamortized Balance ofJoplin Tornado AAO, SPP TransmissionExpense, True-Up, Advanced Coal	Settled
Missouri-American Water Company	WR-2011-0337	Investment Tax Credit <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
Missouri-American Water Company	WR-2010-0131	Report on Cost of Service- Pension/OPEBTracker, Tank Painting Tracker, DeferredIncome Taxes, FAS 87 Pension Costs, FAS106 – 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	Report on Cost of ServiceReport on Cost of ServicePension Asset, Pension TrackerAsset/Liability, Unamortized AccountingAuthority Order Balances, PensionExpense, OPEBs, Amortization of StockIssuance Costs, Amortization of AccountingAuthority OrdersDirectOverview of Staff's Filing	Settled
Laclede Gas Company	GT-2009-0056	Surrebuttal Testimony – Tariff	Contested

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

WHILE EMPLOYED WITH THE OFFICE OF THE PUBLIC COUNSEL

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Missouri Gas Energy	GU-2005-0095	<u>Rebuttal</u> - Accounting Authority Order <u>Surrebuttal</u> - Accounting Authority Order	Contested
The Empire District Electric Company	ER-2004-0570	Direct- Payroll	Settled
Missouri American Water Company & Cedar Hill Utility Company	SM-2004-0275	Direct- 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

WHILE EMPLOYED WITH THE OFFICE OF THE PUBLIC COUNSEL

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

WHILE EMPLOYED WITH THE OFFICE OF THE PUBLIC COUNSEL

<u>Company Name</u>	Case Number	<u>Testimony/Issues</u>	Contested or Settled
Osage Water Company	SR-2000-556/ WR-2000-557	<u>Direct</u> - Customer Service	Contested
St. Louis County Water Company	WR-2000-844	Direct- Main Incident Expense	Settled
Missouri American Water Company	WR-2000-281/ SR-2000-282	Direct-Water Plant Premature Retirement;Rate Case ExpenseRebuttal-Water Plant PrematureRetirementSurrebuttal-Water Plant PrematureRetirement	Contested
Laclede Gas Company	GR-99-315	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up	Contested
St. Joseph Light & Power	HR-99-245	<u>Direct</u> - Advertising Expense; Dues & Donations; Miscellaneous Expense; Items to be Trued-up <u>Rebuttal</u> - Advertising Expense <u>Surrebuttal</u> - Advertising Expense	Settled
St. Joseph Light & Power	ER-99-247	Direct - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs Rebuttal - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs Surrebuttal - Merger Expense; Rate Case Expense; Deferral of the Automatic Mapping/Facility Management Costs	Settled
Laclede Gas Company	GR-98-374	<u>Direct</u> - Advertising Expense; Gas Safety Replacement AAO; Computer System Replacement Costs	Settled

WHILE EMPLOYED WITH THE OFFICE OF THE PUBLIC COUNSEL

Company Name	Case Number	Testimony/Issues	Contested or Settled
Missouri Gas Energy	GR-98-140	<u>Direct</u> - Payroll; Advertising; Dues & Donations; Regulatory Commission Expense; Rate Case Expense	Contested
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	Direct-Acquisition Adjustment; InterestRates for Customer DepositsRebuttal-Acquisition Adjustment;Interest Rates for Customer DepositsSurrebuttal-Interest Rates for Customer DepositsDeposits	Contested
Missouri-American Water Company	WA-97-45	<u>Rebuttal</u> - Waiver of Service Connection Charges	Contested
Imperial Utility Corporation	SC-96-427	Direct- Revenues, CIAC Surrebuttal- Payroll; Uncollectible Accounts Expense; Rate Case Expense, Revenues	Settled
St. Louis Water Company	WR-96-263	<u>Direct</u> -Main Incident Repairs <u>Rebuttal</u> - Main Incident Repairs <u>Surrebutta</u> l- Main Incident Repairs	Contested
Steelville Telephone Company	TR-96-123	<u>Direct</u> - Depreciation Reserve Deficiency	Settled

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WHILE EMPLOYED WITH THE OFFICE OF THE PUBLIC COUNSEL

<u>Company Name</u>	Case Number	Testimony/Issues	Contested or Settled
Missouri-American Water Company	WR-95-205/ SR-95-206	Direct-Property Held for Future Use;Premature Retirement of Sewer Plant;Depreciation Study Expense; DeferredMaintenanceRebuttal-Property Held for Future Use;Premature Retirement of Sewer Plant;Deferred MaintenanceSurrebuttal-Property Held for FutureUse; 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

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SCHEDULE KKB-d2

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY