

Exhibit No.:
Issue(s): *Weather Normalization*
Witness: *Michael L. Stahlman*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *ER-2024-0261*
Date Testimony Prepared: *August 18, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

TARIFF/RATE DESIGN DEPARTMENT

REBUTTAL TESTIMONY

OF

MICHAEL L. STAHLMAN

**THE EMPIRE DISTRICT ELECTRIC COMPANY,
d/b/a Liberty**

CASE NO. ER-2024-0261

Jefferson City, Missouri
August 2025

1 the SP load data made a small adjustment to revenues that Staff Witness Kim Cox will include
2 in her true-up workpapers.

3 Q. Did Eric Fox combine the LGS and SP customer classes?

4 A. Yes. Footnote 3 on page 4 of his direct testimony states, “The four Large General
5 Service schedules are Non-Standard Large General Service (Schedule NS-LG), Time Choice
6 Large General Service (Schedule TC-LG), Non-Standard Small Primary Service (Schedule
7 NS-SP), and Time Choice Small Primary Service (Schedule TC-SP).”

8 Q. What is the operational difference between these two classes?

9 A. The main difference seems to be that LGS operates at secondary voltage and SP at
10 primary voltage levels. Secondary voltages are typically the same as the voltages delivered to
11 households, approximately 240 Volts (“V”) single phase, where primary voltages are much
12 higher, approximately 2.4kV to 46kV and are normally three-phase.

13 Q. Should these customers be evaluated together?

14 A. No. Based on my weather normalization regression analysis, there were
15 differences between these customer classes, thus they should be evaluated separately.
16 However, the resulting differences in terms of dollars seem to be relatively small with respect
17 to Empire’s rate case.

18 Q. Did Mr. Fox make any corrections in his regression analysis to account for the
19 issues in the daily load data you discussed on page 2 of your direct testimony?

20 A. No, I did not see any changes in his regression analysis to account for these issues.
21 However, these problems would probably not have a large effect on the overall coefficients.

1 Q. Would the concerns you have with the data provided by Empire, as discussed on
2 pages 2 and 3 of your direct testimony also be concerns with the data used in
3 Mr. Fox's testimony?

4 A. Yes. Both Mr. Fox and I relied on the same data sets, so concerns with the quality
5 of the data would be applicable to both weather normalization analyses.

6 Q. Does this conclude your rebuttal testimony?

7 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Request of The Empire)
District Electric Company d/b/a Liberty for)
Authority to File Tariffs Increasing Rates)
for Electric Service Provided to Customers)
in Its Missouri Service Area)

Case No. ER-2024-0261

AFFIDAVIT OF MICHAEL L. STAHLMAN

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW MICHAEL L. STAHLMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Michael L. Stahlman*; and that the same is true and correct according to his best knowledge and belief.

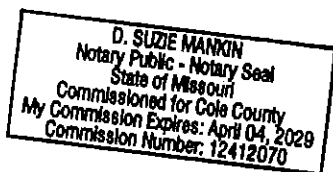
Further the Affiant sayeth not.

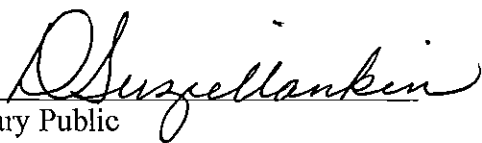


MICHAEL L. STAHLMAN

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 13th day of August 2025.





Notary Public