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	REBUTTAL TESTIMONY		
2	OF		
3	MICHAEL L. STAHLMAN		
4 5	THE EMPIRE DISTRICT ELECTRIC COMPANY, d/b/a Liberty		
6	CASE NO. ER-2024-0261		
7	Q. Please state your name and business address.		
8	A. My name is Michael L. Stahlman, and my business address is Missouri Public		
9	Service Commission, P.O. Box 360, Jefferson City, Missouri 65102.		
10	Q. By whom are you employed and in what capacity?		
11	A. I am employed by the Missouri Public Service Commission ("Commission") as a		
12	Regulatory Economist for the Tariff/Rate Design Department, in the Industry		
13	Analysis Division.		
14	Q. Are you the same Michael L. Stahlman that filed direct testimony in this docket?		
15	A. Yes.		
16	Q. What is the purpose of your testimony?		
17	A. The purpose of my rebuttal testimony is to respond to Empire's witness Eric Fox.		
18	Q. Please summarize your testimony.		
19	A. Mr. Fox and I have very similar methods and relied on the same data. While there		
20	were differences in execution, the differences between the weather normalization and 365-day		
21	adjustments at the end of the update period are relatively small.		
22	Q. Do you have any corrections to your direct workpapers?		
23	A. Yes. I inadvertently combined the Large General Service ("LGS") and Small		
24	Primary ("SP") customer class load data in the LGS weather normalization process. Removing		

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the SP load data made a small adjustment to revenues that Staff Witness Kim Cox will include 1 2 in her true-up workpapers. 3 O. 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 Based on my weather normalization regression analysis, there were A. No. 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.

However, these problems would probably not have a large effect on the overall coefficients.

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

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

Q. Does this conclude your rebuttal testimony?

7 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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) ss.			
COUNTY OF COLE)			
	AN and on his oath declares that he is of sound mind sing <i>Rebuttal Testimony of Michael L. Stahlman</i> ; and s best knowledge and belief.		
Further the Affiant sayeth not.			
Mi	CHAEL L. STAHLMAN		
Л	URAT		
Subscribed and sworn before me, a duly of the County of Cole, State of Missouri, at my of August 2025.	onstituted and authorized Notary Public, in and for office in Jefferson City, on this/3+ day		
D. SUZIE MANTON Notary Public - Notary Seal State of Masouri Commissioned for Cole County My Commission Expires: April 04, 2029 Commission Number: 12412070	Deuxellanken tary Public		