Exhibit No.:

Issue(s): Green Button Connect My

Data

Witness: Matthew W. Lucas
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony

Case No.: ER-2024-0261

Date Testimony Prepared: September 17, 2025

### MISSOURI PUBLIC SERVICE COMMISSION

## INDUSTRY ANALYSIS DIVISION

#### **ENGINEERING ANALYSIS DEPARTMENT**

#### SURREBUTTAL TESTIMONY

**OF** 

**MATTHEW W. LUCAS** 

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

**CASE NO. ER-2024-0261** 

Jefferson City, Missouri September 2025

1		SURREBUTTAL TESTIMONY
2		OF
3		MATTHEW W. LUCAS
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 Matthew Lucas and my business address is 200 Madison Street,
9	Jefferson City, Missouri 65101.	
10	Q.	Are you the same Matthew Lucas who filed rebuttal testimony in this case?
11	A.	Yes.
12	Q.	What is the purpose of your surrebuttal testimony?
13	A.	The purpose of my testimony is to state my general agreement with
14	Empire District Electric Company d/b/a Liberty ("Empire") witness Candice Kelly's position	
15	on Renew Mi	ssouri's Green Button Connect My Data ("GBC") proposal.
16	STAFF RESPONSE TO EMPIRE WITNESS CANDICE KELLY	
17	Q.	What did Renew Missouri propose in regards to GBC?
18	A.	In his revenue requirement and rate design direct testimonies, Renew Missouri's
19	witness Michael Murray proposed that Empire implement GBC as part of this case, and to	
20	include a \$201K revenue requirement for the implementation of GBC and participation in a	
21	regional data hub.	

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- Q. What are Empire's concerns with Renew Missouri's proposal?
  - A. In her rebuttal testimony, Ms. Kelly questions whether Renew Missouri's proposed revenue requirement would be sufficient for a GBC implementation, whether the implementation of GBC would provide value to its customer commensurate with the costs, and the whether it would generally be wise to move forward with GBC at this time due to their ongoing issues with their Customer First implementation.
  - Q. Does Staff share Ms. Kelly's concerns?
    - A. Yes. I raised many of these issues in my rebuttal testimony. While Staff may disagree with Ms. Kelly that Empire is "successfully working through this implementation," it does agree with the general sentiment that now is not the right time to move forward with another complicated customer interface.
      - Q. Does this conclude your surrebuttal testimony?
      - A. Yes it does.

<sup>&</sup>lt;sup>1</sup> Rebuttal Testimony of Candice Kelly, pg. 16, line 6. Referring to Empire's Customer First implementation.

#### 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  Case No. ER-2024-0261
AFFIDAVIT OF MATTHEW W. LUCAS
STATE OF MISSOURI ) ) ss. COUNTY OF COLE )
COMES NOW MATTHEW W. LUCAS and on his oath declares that he is of sound mind
and lawful age; that he contributed to the foregoing Surrebuttal / True-Up Direct Testimony of
Matthew W. Lucas; and that the same is true and correct according to his best knowledge
and belief.
Further the Affiant sayeth not.  MATTHEW W. LUCAS
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 day of September 2025.
D. SUZIE MANKIN Notary Public - Notary Seet State of Masouri Commissioned for Cole County My Commission Expires: April 04, 2029 Commission Number: 12412070