

Exhibit No. 3

Empire District Electric Company – Exhibit 3
Testimony of Brian Berkstresser
Surrebuttal
File No. ER-2024-0261

Exhibit No.: _____
Issue: Ozark Beach Crane Extension
Witness: Brian Berkstresser
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: The Empire District
Electric Company d/b/a Liberty
Case No.: ER-2024-0261
Date Testimony Prepared: September 2025

**Before the Public Service Commission
of the State of Missouri**

Surrebuttal Testimony

of

Brian Berkstresser

on behalf of

The Empire District Electric Company d/b/a Liberty

September 17, 2025



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FOR THE SURREBUTTAL TESTIMONY OF BRIAN BERKSTRESSER
THE EMPIRE DISTRICT ELECTRIC COMPANY D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. ER-2024-0261

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SURREBUTTAL TESTIMONY OF BRIAN BERKSTRESSER
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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Brian Berkstresser. My business address is 602 S. Joplin Ave, Joplin,
4 Missouri 64801.

5 **Q. Are you the same Brian Berkstresser who provided direct and rebuttal testimony**
6 **in this matter on behalf of The Empire District Electric Company d/b/a Liberty**
7 **(“Liberty” or the “Company”)?**

8 A. Yes.

9 **Q. What is the purpose of your surrebuttal testimony in this proceeding before the**
10 **Missouri Public Service Commission (“Commission”)?**

11 A. I will be addressing the rebuttal testimony of Dr. Goeff Marke on behalf of the Office
12 of Public Counsel regarding the Ozark Beach hydroelectric dam crane extension.

13 **II. OZARK BEACH CRANE EXTENSION**

14 **Q. Why does Dr. Marke recommend disallowance of the \$2.9 million for the Ozark**
15 **Beach dam crane extension project?**

16 A. The point of contention seems to be the difference between the initial estimate given
17 and the final cost of the project.

18 **Q. Please explain the difference between the initial estimate and final project cost.**

19 A. The initial estimate reflected the cost of a feasibility study to assess whether the project
20 was viable. Once the study confirmed viability, a subsequent capital request of \$3.5
21 million was submitted to fund the full scope of work. **Surrebuttal Schedule BB-1**
22 provides supporting documentation from the Company’s project monitoring system.

1 Page 1 shows the original request for the feasibility study. Pages 2 and 3 of **Surrebuttal**
2 **Schedule BB-1** include screen shots of the appropriate approvals and controls
3 associated with the full crane extension project. To avoid future confusion, Liberty is
4 working to ensure that feasibility and engineering estimates are clearly distinguished
5 from total project cost estimates in internal reporting.

6 **Q. Is the Ozark Beach crane extension project in-service and delivering benefits?**

7 A. Yes. The project was placed in service in December 2022 and is now regularly used to
8 transport materials and equipment to the dam. Prior to the extension, large equipment
9 had to be moved via barge – a process that was both difficult and posed significant
10 safety risks. The crane extension project now allows for trucks to deliver materials
11 directly beneath the extension, allowing for safe and efficient transfer into the main
12 crane bay. This upgrade has significantly improved both safety and operational
13 efficiency.

14 **Q. What was the final project cost for the Ozark Beach crane extension included in**
15 **the Company's cost of service?**

16 A. The final amount included in the Company's cost of service is \$2.9 million, which is
17 below the \$3.5 million originally budgeted for the project. The Company considers this
18 a prudent capital investment as outlined in my above testimony. Dr. Marke did not
19 question the prudence of the costs, rather his proposed disallowance appears to be
20 based solely on the difference between budgeted and actual costs.

21 **Q. Does Dr. Marke believe this project is PISA eligible?**

22 A. No. As stated in his rebuttal testimony, he does not believe it qualifies as it is not related
23 to grid modernization.

24 **Q. Are you in agreement with Dr. Marke?**

1 A. No, please refer to the surrebuttal testimony of Charlotte T. Emery for further
2 discussion.

3 **III. CONCLUSION**

4 **Q. Does this conclude your surrebuttal testimony at this time?**

5 A. Yes.

VERIFICATION

I, Brian Berkstresser, under penalty of perjury, on this 17th day of September, 2025,
declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Brian Berkstresser