Exhibit No. 118

Staff – Exhibit 118 Testimony of Lindsey Smith Direct File No. ER-2024-0261

Exhibit No.:

Issue(s): Cash Working Capital,

Customer Advances, Customer Deposits and Interest Expense, Dues and Donations, EEI Dues, Materials and Supplies,

Payroll, Payroll Taxes, Payroll Benefits, Prepayments

Witness: Lindsey Smith

Sponsoring Party: MoPSC Staff
Type of Exhibit: Direct Testimony

Case No.: ER-2024-0261

Date Testimony Prepared: July 2, 2025

MISSOURI PUBLIC SERVICE COMMISSION

FINANCIAL & BUSINESS ANALYSIS DIVISION AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

LINDSEY SMITH

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

CASE NO. ER-2024-0261

Jefferson City, Missouri July 2025

1	TABLE OF CONTENTS OF	
2	DIRECT TESTIMONY OF	
3	LINDSEY SMITH	
4 5	THE EMPIRE DISTRICT ELECTRIC COMPANY, d/b/a Liberty	
6	CASE NO. ER-2024-0261	
7	EXECUTIVE SUMMARY	2
8	CASH WORKING CAPITAL	2
9	CUSTOMER ADVANCES	5
10	CUSTOMER DEPOSITS AND INTEREST EXPENSE	5
11	DUES AND DONATIONS	7
12	EDISON ELECTRIC INSTITUTE DUES	8
13	MATERIALS AND SUPPLIES	11
14	PAYROLL	12
15	PAYROLL TAXES	13
16	PAYROLL RELATED BENEFITS	14
17	PREPAYMENTS	14

1		DIRECT TESTIMONY
2		OF
3		LINDSEY SMITH
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 Lindsey Smith. My business address is 615 East 13th Street,
9	Kansas City, Missouri 64106.	
10	Q.	By whom are you employed and in what capacity?
11	A.	I am employed by the Missouri Public Service Commission ("Commission")
12	as a Senior U	tility Regulatory Auditor.
13	Q.	Please describe your educational background and experience.
14	A.	I attended the University of Central Missouri where I earned a Bachelor of
15	Science degree in finance and a Bachelor of Science degree in economics. I am currently	
16	pursuing a M	aster of Business Administration degree at the University of Central Missouri as
17	well. I have been employed by the Commission since June 2023 with the Auditing Department	
18	Q.	Have you previously filed testimony before this Commission?
19	A.	Yes, I have. Please refer to Schedule LS-d1, attached to this direct testimony,
20	for a list of th	e audits on which I have assisted.

EXECUTIVE SUMMARY

- Q. What is the purpose of your direct testimony?
- A. The purpose of my direct testimony is to discuss Staff's position in this case regarding: cash working capital, customer advances, customer deposits and interest expense, dues and donations, Edison Electric Institute ("EEI") dues, materials and supplies, payroll, payroll taxes, payroll benefits, and prepayments.
- Q. Throughout this testimony, do you provide any recommendations that should be specifically reflected in the Commission's Report and Order in this case?
- A. While Staff will be making many recommendations for the level of annual expense and rate base levels that will ultimately impact the ordered revenue requirement in this case, the issues I address in this testimony typically do not require specific ordered language.

CASH WORKING CAPITAL

- Q. What is Cash Working Capital ("CWC")?
- A. Cash working capital is the amount of cash necessary for a utility to pay the day to day expenses incurred to provide utility service to its customers. When Empire District Electric Company d/b/a Liberty ("Empire") expends funds to pay an expense before its customers provide the cash through rates, the shareholders are the source of funds. Shareholder supplied CWC is reflected as an addition to rate base, which compensates shareholders for supplying CWC. Alternatively, customers supply CWC when they pay for electric services received before Empire pays expenses incurred to provide that service. Customer supplied CWC is reflected as a reduction to rate base, which compensates customers for their supply of CWC.

1	Q.	How is CWC determined?
2	A.	CWC is determined by a lead/lag study which measures the timing of when
3	customer util	ity service is provided, as well as, when customers provide funds to the utility for
4	their utility s	ervice received; then compares that to when the utility must pay for expenses
5	incurred to pr	rovide the utility service to the customer.
6	Q.	What does a positive CWC requirement indicate?
7	A.	A positive CWC requirement indicates that, in the aggregate,
8	shareholders provided the CWC.	
9	Q.	What does a negative CWC requirement indicate?
10	A.	A negative CWC requirement indicates that, in the aggregate,
11	customers provide the CWC.	
12	Q.	Did you review Empire's lead/lag study?
13	A.	Yes. In this case, Empire relied on the lead/lag study approved by the
14	Commission	from one of their previous rate cases, Case No. ER-2019-0374, for expense lead
15	days and relied on the lead/lag study approved by the Commission from their most recent rate	
16	case, Case No	o. ER-2021-0312, for revenue lag days.
17	Q.	Why did Empire rely on expense lead days from Case No. ER-2019-0374 and
18	revenue lag d	ays from Case No. ER-2021-0312?
19	A.	In Case No. ER-2021-0312, Empire updated only the revenue lag to reflect
20	changes in its	s collection lag since Case No. ER-2019-0374. The expense lead days were not
21	updated in the	at case, nor were they updated in this current proceeding, for the following reasons:
22	(1) the expens	se lead days approved by the Commission in Case No. ER-2019-0374 were based
23	on a compreh	ensive review, evaluation and proposed modifications of Empire's lead-lag study

- by the parties in that proceeding; (2) the Commission's decision in Case No ER-2019-0374 was contemporaneous with the test year used to prepare Empire's lead-lag study in this proceeding; and (3) there have been no substantial changes in the Company's payment processes or practices during the test year that would result in a significant change in lead days.

 Q. Does Staff agree with Empire's lead/lag study?
 - A. Yes. Staff reviewed Empire's lead/lag study in this rate proceeding and finds it to be reasonable with the exception of the income tax expense lag.
 - Q. What did Empire propose for its CWC expense lag for income taxes in the current rate case?
 - A. Empire's witness Timothy S. Lyons proposes a 39.38-day expense lag for income taxes.
 - Q. Please explain the current Commission guidance regarding the income tax expense lag as part of the cash working capital (CWC) calculation.
 - A. In Spire Missouri's rate case, GR-2021-0108, OPC witness John A. Riley, proposed to reflect a 365-day expense lag as part of cash working capital because Spire Missouri would not be required to pay income taxes through the period that the rates from the last rate case were in effect. This issue was litigated and the Commission found that:

...federal and state income tax expense is included in rates but the Company is not likely to remit any federal or state income taxes because of its net operating loss carryforward (NOLC)...this lack of income tax payment should be reflected in the CWC expense lag. The fact that no income tax payments have been made in the test year or true-up period justifies the use of a 365-day expense lag. Therefore, the Commission finds that the appropriate expense lag days for income taxes within the CWC calculation is 365 days.

¹ Case No. ER-2021-0312, Timothy Lyons Direct Testimony, page 46, lines 10-17

- 1 Q. Has Staff included a 365-day expense lag in CWC for the current case?
- 2 A. Yes.

- Q. Does your CWC schedule result in an overall positive or overall negative CWC requirement?
- A. The overall CWC schedule resulted in a negative CWC requirement in the aggregate, meaning the customers provided the CWC to Empire. Therefore, the customers should be compensated for the CWC investment that they provide, which is accomplished through a reduction to Empire's rate base reflected in Staff's Accounting Schedules.

CUSTOMER ADVANCES

- Q. Please describe customer advances.
- A. Customer advances are funds typically provided by construction developers to Empire in order to ensure that Empire builds electric infrastructure in areas that have potential for future development. These advances are also used by the utility to establish electric service for potential future customers without investing a substantial amount of money at the risk of the utility and its other customers. Customer advances are included in a utility's rate base as an offset, reducing the amount of overall investment that customers must supply as a return to the utility.
 - Q. What is Staff's recommended treatment of customer advances?
- A. Staff reviewed monthly balances from September 2023 to September 2024 for customer advances and performed an analysis to determine if there is a discernible trend, for account numbers 252100 (Customer Advances for Construction- Electric) and 252110 (Customer Advances for Subdivision Construction- Electric). After analysis, the data revealed that there is a no discernable trend for account number 252100 and no discernable trend for

account number 252110 as well. Staff included a 13-month average ending September 30, 2024,

2 as an offset to rate base for both accounts.

CUSTOMER DEPOSITS

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

- Q. What are customer deposits?
- A. Customer deposits are funds required to be provided by certain customers in order to initiate service as security against potential losses from failure to pay the utility for service provided. Since deposits are supplied by the customers, a representative level is deducted from Empire's rate base to ensure that the utility does not earn a return on the value of these deposits.
 - Q. Is Empire required to return the deposits to customers after a period of time?
- A. Yes. After satisfactory payment over either a specified amount of time or upon the satisfaction of certain requirements, Empire must return the deposit to the customer, including accrued interest.²
 - Q. Is customer deposit interest included in Empire's cost of service?
- A. Yes. Since Empire is required to refund the deposits, including interest, an appropriate level of interest expense should be included in the utility's cost.
 - Q. How is interest expense determined?
- A. Consistent with Empire's tariff, Staff applied the prime interest rate published in the Wall Street Journal as being in effect on the last business day of December of the prior year (7.50% at December 31, 2024) plus 1%, for a total of 8.50%, to its recommended customer deposit balance.³

² Empire Rules and Regulations, Tariff YE-2021-0041

³ Empire Rules and Regulations, Tariff YE-2021-0041

- Q. Please explain Staff's recommended level of customer deposits included in rate base and the corresponding adjustment for interest expense.
- A. Staff reviewed customer deposit monthly balances from September 2023 to September 2024, and performed an analysis to determine if there was a discernible trend. There was a fluctuating trend in customer deposits. To accurately summarize overall behavior of customer deposits, Staff included a 13-month average, September 2023 to September 2024, as an offset to rate base. Staff calculated interest expense based on the level of customer deposits included in Staff's rate base schedule. Staff utilized the formula included in the tariff (YE-2021-0041 5 Schedule 6, Sec 3, Sheet 5) to calculate the customer deposit interest. The appropriate amount for interest expense on Staff's normalized customer deposits based on this formula has been included as an adjustment to the income statement.

DUES AND DONATIONS

- Q. What are dues and donations expenses?
- A. Dues and donations are expenditures made by a utility to different organizations, charitable funds, clubs, economic development programs, and other groups. Dues are usually defined as amounts a utility pays to organizations to allow the utility or its employees to participate in and benefit from the organization's activities. Donations, on the other hand, are discretionary amounts paid to individuals or organizations for charitable purposes, with no direct benefit to the utility's business nor its ratepayers.
 - Q. Please explain Staff's analysis of Empire's dues and donations expenditures.
- A. Staff reviewed the list of membership dues paid and donations made to various organizations that Empire charged to their utility accounts during the test year. In the current case, Staff applied the four criteria used in Kansas City Power and Light's 1985 general rate

- case, Case No. EO-85-185, to establish when dues and donations expenses should not be included in customer rates. The criteria for disallowing dues and donation expenses are:
 - (1) The expenses are involuntary ratepayer contributions of a charitable nature;
 - (2) The expenses are supportive of activities that are duplicative of those performed by other organizations to which the Company belongs or pays dues;
 - (3) The expenses are associated with active lobbying activities which have not been demonstrated to provide any direct benefit to the ratepayers; or,
 - (4) The expenses represent costs of other activities that provide no benefit or increased service quality to the ratepayer.

In regard to the criteria listed above, Staff excluded dues and donations that do not have any direct benefit to ratepayers and were not necessary for the provision of safe and adequate service. Allowing Empire to recover these expenses through rates causes the ratepayer to involuntarily contribute to these organizations. Examples of dues and donations excluded from recovery in this rate case are dues paid to Amazon, Sam's Club, press and media firms, energy marketing associations, rotary clubs, and fire departments. Area Chamber of Commerce dues were allowed, but State Chamber of Commerce dues were disallowed as being duplicative costs to the local Chamber of Commerce organizations. While Staff recognizes the importance of being a good corporate citizen in the communities served by utilities, dues and donations that do not provide any direct benefit to ratepayers and are not necessary for the provision of safe and adequate service should be excluded from Empire's revenue requirement.

EDISON ELECTRIC INSTITUTE DUES

- Q. What is Edison Electric Institute?
- A. According to the February 2024 Lobbying, Advocacy, and Other Expenditures report on the EEI website, EEI was organized in 1933 and provides public policy leadership, strategic business intelligence, and essential conferences and forums. The report also states:

1 2 3 4 5 6	EEI's member companies are among the most regulated companies in the country, and EEI engages on their behalf with federal and state legislators, regulators, and other policymakers through lobbying, advocacy, and regulatory proceedings, with the goal of providing customers with the affordable, reliable, and resilient clean energy they need and expect.	
7	Q. Would a goal of providing customers with affordable, reliable, and resilien	
8	clean energy be a good thing for ratepayers?	
9	A. That depends. EEI engages on behalf of the member utility companies, not the	
10	ratepayer. That means the lobbying, advocacy, and regulatory proceeding engagements that EE	
11	does would above all else be in the best interest of the member utility companies	
12	Allowing recovery of EEI dues in rates would make customers involuntary contributor	
13	supporting such lobbying, advocacy, and regulatory proceeding engagements that not a	
14	ratepayers might otherwise support.	
15	Q. Has the Commission made any rulings in prior cases that provide direction	
16	regarding EEI dues?	
17	A. Yes. In Case Nos. ER-81-42, ER-82-66 and EO-85-185.	
18	In Case No. ER-81-42, the Commission stated the following in its report and order:	
19 20 21 22	The rule has always been that dues to organizations may be allowed as operating expenses where a direct benefit can be shown to accrue to the ratepayers of the company. Conversely, where that sort of benefit does not appear, disallowance of the dues is required.	
23	In Case No. ER-82-66, the Commission stated the following in its report and order:	
24 25 26 27 28	The Commission still believes the question is one of benefit to the ratepayer. In the instant case there appears to be some possible benefit, but until the Company [KCPL] can better quantify the benefit and the activities that were the causal factor of the benefit, the Commission must disallow EEI dues as an expense.	

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16 17

18 19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

In Case No. EO-85-185, the Commission stated the following in its Report and Order:

Historically, the Commission has disallowed EEI dues from rate case expense on the basis of EEI's involvement in lobbying. In 1981, the Commission adopted a benefit standard which would allow EEI dues if a direct benefit to the ratepayers could be shown...The Commission has since refined that standard to include not only a direct quantifiable benefit to the ratepayer, but also a method of allocating the expenses between the shareholders and the ratepayers once the benefits have been quantified...In the instant case, there is conflicting testimony on the amount of EEI resources devoted to lobbying. The Commission does not find it necessary to discuss whether or not EEI is devoted primarily to lobbying. The actual percentage of lobbying is not the controlling factor here. The question is whether the Company has quantified the EEI-derived benefits and allocated them between the shareholders and ratepayers...The determining factor is what proportion of those benefits should be allocated to the ratepayer as opposed to the shareholder. It is obvious that the interests of the electric industry are not consistently the same as those of the ratepayers...The Company has been informed in prior rate cases that it must allocate its quantified benefits from membership in EEI. That has not been done herein. Therefore, no portion of EEI dues will be allowed in this case.

- Q. Has the Commission issued any Orders that allowed EEI dues as an expense since the direction provided by the above three orders from the 1980's?
- A. Not to my knowledge. I reviewed previous rate cases and did not find any other instances where EEI dues were litigated before this Commission.
- Q. Did any Empire witness sponsor direct testimony related to EEI dues or quantify their benefit to ratepayers?
 - A. No.
- Q. Did Empire propose any adjustments related to EEI dues in their Direct filed revenue requirement model?
- A. No. However, through my analysis, I determined that Empire booked 28% of the test year EEI dues to non-regulated utility operations, which means 72% of the test year EEI dues are included in regulated utility operation accounts.

- Q. What is Staff's recommendation regarding EEI dues and fees included in the test year?
- A. Since Empire did not identify direct quantifiable benefits to the ratepayer or explain their method of allocating the expenses between the shareholders and the ratepayers in direct testimony, and consistent with prior Commission Report and Orders, Staff removed the amount of EEI dues and fees included in the test year expense from Empire's cost of service.
- Q. Does Staff recommend disallowing all types of dues or donations made by Empire?
- A. No. Please refer to page five of this testimony for Staff's position on other types of dues and donations aside from EEI.

MATERIALS AND SUPPLIES

- Q. Describe materials and supplies as they relate to Empire.
- A. Materials and supplies are the cost of materials that are purchased primarily for use in the construction, operation, and maintenance of utility plant, but are not directly assignable to specific plant accounts. Materials and supplies represent an investment in inventory for items such as spare parts, electric cables, poles, meters, and other miscellaneous items used in daily operations, maintenance, and construction activities by Empire to maintain and build their facilities and electric system.
 - Q. How did Staff evaluate Empire's materials and supplies?
- A. Staff examined each account individually to determine whether trends within an individual account existed over time and to determine an appropriate level that most accurately reflects the ongoing future investment costs of a particular account that should be included in rate base.

revenue requirement?

23

What is Staff's recommended treatment of Empire's materials and supplies? 1 Q. 2 A. Staff reviewed the monthly balances for materials and supplies accounts from 3 September 2023 to September 2024. Staff found there was no discernible trend in the accounts, therefore, a 13-month average ending September 30, 2024, was determined to be the most 4 5 appropriate measure of the ongoing investment levels of materials and supplies accounts. **PAYROLL** 6 7 Q. How did Staff annualize Empire's employee payroll expense? Staff adjusted Empire's test year payroll expense to reflect annualized levels of 8 A. 9 payroll costs based on actual employee levels as of the end of the update period, 10 September 30, 2024. 11 Q. What is an Operations & Maintenance ("O&M") ratio? 12 A. The O&M ratio is a calculation of the split between the amount of payroll that 13 is expensed on the income statement (expense accounts), and the amount that is capitalized on 14 the balance sheet (e.g. plant accounts). The balance sheet (plant accounts) is a rate base item 15 which Empire earns a return on their investment as compared to the income statement 16 (expense accounts) which Empire earns a return of the expenses but not a return on the items. 17 The O&M ratio is used to determine the appropriate level of payroll expense to include in Empire's income statement. 18 19 Q. What O&M ratio did you apply to Empire's payroll? 20 Staff determined an allocation rate between expense and construction based on A. 21 a three-year average of historical O&M ratios. 22 Q. How did you determine the amount of payroll expense to include in the

- A. I used actual employee and wage data as of the September 30, 2024, update period. That is the sum of total payroll allocated to Empire, adding in overtime then multiplying that sum by the O&M ratio to determine the level of expense to distribute to payroll expense accounts in Staff's Accounting Schedules.
 - Q. Was Empire overtime expense analyzed?
- A. Yes, Empire overtime was analyzed. Staff calculated a reasonable overtime percentage for each Empire employee and multiplied that by the annualized salary of each employee as of September 30, 2024. This product was then added to each employee's expensed annualized salary to reach a total annualized payroll amount with overtime. The overtime percentage was computed based upon overtime hours and costs incurred 12 months ending September, 2024.

PAYROLL TAXES

- Q. What are payroll taxes?
- A. Payroll taxes include federal income taxes such as FICA, Medicare, and state and federal unemployment taxes applicable to payroll.
 - Q. Does Empire pay state unemployment taxes in Missouri?
- A. No. Empire qualifies for the State of Missouri's tax experience rate which is an employer specific tax rate based on the employer's historical unemployment claims. Empire's tax experience rate is 0% so they do not pay Missouri unemployment taxes. Therefore, I did not include a Missouri unemployment tax amount in my payroll tax adjustment.

- Q. How did you calculate the amount of payroll taxes to include in Staff's Accounting Schedule?
- A. I calculated payroll taxes based on the September 2024 payroll data discussed in the previous section. I applied the current payroll tax rate to each employee's annualized level of payroll. I then applied the same O&M ratio that I used for payroll to get the annualized level of payroll taxes and compared this annualized amount of payroll taxes to the test year expense amount and reflected the appropriate adjustment in Staff's Accounting Schedules.

PAYROLL RELATED BENEFITS

- Q. What are payroll related benefits?
- A. Payroll related benefits cover a variety of items such as 401k matching costs and employee insurance premium contributions incurred by Empire.
- Q. How did you determine the level of payroll related benefits to include in Staff's Accounting Schedules?
- A. I reviewed the actual charges through the update period of September 30, 2024, and compared those costs to the test year and reflected an adjustment in Staff's Accounting Schedules.

PREPAYMENTS

- Q. Please describe prepayments.
- A. Prepayments are expenses that Empire pays in advance of the associated good or service purchased. Since there are investment costs incurred by the utility when prepayments establish a future economic benefit, the company is allowed to earn a return on these amounts through inclusion in rate base. For example, Empire prepays for property insurance to protect

6

7

8

9

10

11

12

13

- their assets from financial loss in advance of the coverage period. Accordingly, the cost of that insurance policy is considered to be a prepaid asset and included in rate base to allow a return on the unused portion of the prepaid asset. As the prepayments are consumed, an amount is charged to an expense account in the income statement.
 - Q. What is Staff's recommended treatment for prepayments?
 - A. Staff's recommended treatment of prepayments is to examine each prepayment account individually in order to determine an appropriate measure that most accurately predicts the ongoing future investment costs of a particular prepayment account, and then to include the appropriate level of prepayments in Empire's rate base. Staff examined all of Empire's prepayment account balances from September 2023 to September 2024 on a month-by-month basis. Staff used a 13-month average ending September 30, 2024, to include in rate base for all prepayments required for Empire to provide electric utility service to their customers.
 - Q. Does this conclude your direct testimony?
- 14 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 Case No. ER-2024-0261
AFFIDAVIT OF LINDSEY SMITH
STATE OF MISSOURI) ss. COUNTY OF <u>fackson</u>
COMES NOW LINDSEY SMITH and on her oath declares that she is of sound mind and
lawful age; that she contributed to the foregoing Direct Testimony of Lindsey Smith; and that the
same is true and correct according to her best knowledge and belief.
Further the Affiant sayeth not. LINDSEY SMITH
JURAT
Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for
the County of fackson, State of Missouri, at my office in
the County of <u>fackson</u> , State of Missouri, at my office in <u>Kansus City</u> , on this <u>30 th</u> day of June 2025.
B. L. STIGGER NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOUR! MY COMMISSION EXPIRES JANUARY 2, 2028 JACKSON COUNTY COMMISSION #24332661

Lindsey Smith

Educational and Employment Background and Credentials

I am currently employed as a Senior Utility Regulatory Auditor for the Missouri Public Service Commission ("Commission"). I earned a Bachelor of Business Administration in Finance and a Bachelor of Business Administration in Economics from The University of Central Missouri in May 2023. I am currently pursuing a Master of Business Administration degree at the University of Central Missouri as well. I have been employed by the Commission since June 2023.

As a Senior Utility Regulatory Auditor, I perform rate audits and prepare miscellaneous filings for consideration by the Commission. In addition, I review all exhibits and testimony on assigned issues, develop accounting adjustments and issue positions which are supported by workpapers and written testimony. For cases that do not require prepared testimony, I prepare Staff Recommendation Memorandums.

Cases in which I have participated and the scope of my contributions are listed below:

Case/Tracking Number	Company Name- Type of Case; Issues
GR-2025-0107	Spire, Inc.
	Line Locate Expense, Injuries & Damages, Oil Revenue, Miscellaneous Gas Revenue, Other Miscellaneous Revenue, Uncollectibles, EMS Run/Test Year
WA-2025-0090	MRG Utilities
SA-2025-0091	Certificate of Convenience and Necessity
GO-2025-0026	Spire, Inc.
	Infrastructure System Replacement Surcharge
ER-2024-0189	Evergy Missouri West Advertising Expense, Credit Card Fees, CS-11-Misc. Adjustments, Incentive Compensation, Income Eligible Program (Costs Only), Meter Replacement O&M, Outside Services, Rate Case Expense (Including Sharing), Critical Needs Program (Cost Recovery Only)
GO-2024-0214	Spire, Inc. Infrastructure System Replacement Surcharge

cont'd Lindsey Smith

Case/Tracking Number	Company Name- Type of Case; Issues
SA-2024-0129	Confluence Rivers
	Certificate of Convenience and Necessity
GO-2023-0432	Spire, Inc.
	Infrastructure System Replacement Surcharge
WA-2023-0450	Confluence Rivers
SA-2023-0451	Certificate of Convenience and Necessity