Exhibit No. 134

Staff – Exhibit 134
Testimony of Amanda Arandia
Rebuttal
File No. ER-2024-0261

Exhibit No.:
Issue(s): *VOLL and TEPP*
Witness: *Amanda Arandia*
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

ENGINEERING ANALYSIS DEPARTMENT

REBUTTAL TESTIMONY

OF

AMANDA ARANDIA

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

CASE NO. ER-2024-0261

Jefferson City, Missouri
August 2025

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Q. Please state your name and business address.

A. My name is Amanda Arandia. My business address is 200 Madison Street, Jefferson City, Missouri 65102.

Q. Are you the same Amanda Arandia that filed Direct Testimony in this case?

A. Yes.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Empire witness Dmitry Balashov regarding the updates provided on the following matters: Value of Lost Load Study and the Transportation Electrification Pilot Program ("TEPP").

VALUE OF LOST LOAD STUDY

Q. On page eight of his direct testimony Dmitry Balashov provided an update to the Value of Lost Load Study ("VOLL") which Empire agreed to in Case No. ER-2021-0312. What were the terms of the aforementioned agreement?

A. The agreement was that Empire would obtain a consultant to conduct a VOLL by means of issuance of a competitive Request for Proposal ("RFP"). Additionally, it was agreed that Staff and OPC would have input on the selection of the consultant, the scope, and the timing of the study and that Empire would be allowed to recover the costs of the study.

It was agreed that Staff, OPC, and Empire, could elect not to pursue a VOLL study in the event the cost outweighs the expected benefits of such a study and that when the study is complete, Empire, Staff, and OPC may recommend to the Commission changes to Empire's tariff they believe are supported by the study's results.[1]

Q. What is the status of the VOLL?

A. Empire issued RFP's to four firms and one was selected with input from Staff and OPC. Due to the cost of the VOLL study, it was decided by the parties that Empire would participate along with Ameren Missouri and Evergy Missouri and they would share the cost. Dmitry Balashov stated in his direct testimony that the vendor informed the parties that the study could not be completed until 2025.[2]

Q. Does Staff have any recommendations regarding the VOLL Study?

A. Staff recommends the parties meet again after the conclusion of the study to discuss the results.

ELECTRIFICATION PILOT PROGRAM

Q. What is the Electrification Pilot Program?

A. Empire's Electrification Pilot Program is a program that was approved in Case No. ET-2020-0390 and includes the Residential Smart Charge Program, the Ready Charge Pilot Program, the Commercial Electrification Pilot Program, the School Bus Pilot Program, and the Non-Road Electrification Pilot Program.

Q. Did Empire provide an update of this program?

A. Yes.

[1] ER-2021-0312, Fourth Stipulation and Agreement, page 3.
[2] Direct Testimony of Dmitry Balashov, page 11, lines 2-3.

Q. How is the program performing?

A. In his Direct Testimony, Dmitry Balashov stated that customer enrollment has been modest.[3] Mr. Blashov discusses enrollment on page 32 of his testimony.

- Residential Smart Charge Program – 39 participants out of 500 spots
- Ready Charge Pilot Program – 3 site hosts
- School Bus Pilot Program – 1 school enrolled
- Commercial Electrification Pilot Program – no participants
- Non-Road Electrification Pilot Rebate Program – no expenditures

Q. To what cause or causes does Empire attribute the modest participation levels?

A. Dmitry Balashov stated in his Direct Testimony that Empire attributes this to changes in the economy resulting in the need for customers to budget, supply chain issues and rising costs related to the COVID-19 pandemic, and tariff provisions that have limited Empire's ability to enroll interested customers – specifically the residential and commercial programs.[4] Mr. Balashov indicated in his direct testimony that the minimum number of EV chargers for entry into the commercial program is more than what many customers need and that a number of residential customers interested in the program were unable to participate because they already owned EV chargers which made them ineligible under the program rules. Additionally, ENEL X Way USA ("ENEL"), the vendor of the program chargers, closed its operations in North America as of October 11, 2024, causing the software and networking features that customers and Empire relied upon to remotely access and analyze charging information to no longer be available.[5]

[3] Direct Testimony of Dmitry Balashov, page 32, lines 5-6.
[4] Direct Testimony of Dmitry Balashov, page 33 – 34.
[5] Direct Testimony of Dmitry Balashov, page 38.

Q. Is Empire proposing any amendments to the TEPP program at this time?

A. No.

Q. Does Staff have any concerns about the TEPP program?

A. Yes. As part of the *Global Stipulation and Agreement* filed in ET-2020-0390, Empire agreed to provide reports at various points during the pilot term, including a Mid-Term Program Check-In presentation, which has already taken place. Empire additionally agreed to provide a report on pilot metrics and insights within three months from the pilot program's conclusion.[6] Mr. Balashov admits in his testimony that the program has not been performing as well as Empire had anticipated,[7] and while Empire has been tracking metrics as agreed to in ET-2020-0390 and has even attributed program struggles to specific causes, Empire has requested no modifications to the program supported by its findings. Additionally, according to its 2025 PISA Annual Report filed in EO-2019-0046, Empire has $1.9 million investment planned for Transportation Electrification.[8]

Additionally, as discussed in the Direct Testimony of Sarah L.K. Lange[9] the EV chargers that were installed under the program are unsupported due to the manufacturer exiting the EV charging market, presenting cybersecurity and operability concerns and compromising the ability of Empire to access customer charging data necessary for bill calculation.

Q. Does Staff have any recommendations regarding the TEPP program?

A. As discussed in the Direct Testimony of Sarah L.K. Lange, Staff recommends freezing the Residential EV Charger Pilot Program after the effective date of rates in this case, and the tariff language on P.S.C. Mo. No. 6 Sec. 3 Original Sheet No. 10b, be changed from

[6] Global Stipulation and Agreement filed in ET-2020-0390, page 9.
[7] Direct Testimony of Dmitry Balashov, page 33.
[8] EO-2019-0046, 2025 PISA Annual Report, page 5.
[9] Direct Testimony of Sarah L.K. Lange, page 74.

"New installations under this program shall not be available during program Year 5," should be replaced with "New installations under this program shall not be available after the effective date of rates in File No. ER-2024-0261."[10] Additionally, as the Mid-term Check-In that was agreed to in the *Global Stipulation and Agreement* filed in ET-2020-0390 has already occurred and no changes were proposed as a result of that Check-In, Staff recommends the Commission order Empire to schedule an additional Mid-term Check-In at the halfway point to go over updated program results and reassess the program.

Q. Does this conclude your rebuttal testimony?

A. Yes, it does.

[10] Direct Testimony of Sarah L.K. Lange, page 76 - 77.

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 AMANDA ARANDIA

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW AMANDA ARANDIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amanda Arandia*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Amanda Arandia
AMANDA ARANDIA

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.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2029
Commission Number: 12412070

D Suzie Mankin
Notary Public