

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*

1
2
3
4
5
6
7
8

TABLE OF CONTENTS OF
REBUTTAL TESTIMONY OF
AMANDA ARANDIA
THE EMPIRE DISTRICT ELECTRIC COMPANY,
d/b/a Liberty
CASE NO. ER-2024-0261

Value of lost load study1

Electrification pilot program.....2

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

5 Q. What is the status of the VOLL?

6 A. Empire issued RFP's to four firms and one was selected with input from Staff
7 and OPC. Due to the cost of the VOLL study, it was decided by the parties that Empire would
8 participate along with Ameren Missouri and Evergy Missouri and they would share the cost.
9 Dmitry Balashov stated in his direct testimony that the vendor informed the parties that the
10 study could not be completed until 2025.²

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

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

14 **ELECTRIFICATION PILOT PROGRAM**

15 Q. What is the Electrification Pilot Program?

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

20 Q. Did Empire provide an update of this program?

21 A. Yes.

¹ ER-2021-0312, Fourth Stipulation and Agreement, page 3.

² Direct Testimony of Dmitry Balashov, page 11, lines 2-3.

1 Q. How is the program performing?

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

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

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

10 A. Dmitry Balashov stated in his Direct Testimony that Empire attributes this to
11 changes in the economy resulting in the need for customers to budget, supply chain issues and
12 rising costs related to the COVID-19 pandemic, and tariff provisions that have limited Empire's
13 ability to enroll interested customers – specifically the residential and commercial programs.⁴
14 Mr. Balashov indicated in his direct testimony that the minimum number of EV chargers for
15 entry into the commercial program is more than what many customers need and that a number
16 of residential customers interested in the program were unable to participate because they
17 already owned EV chargers which made them ineligible under the program rules. Additionally,
18 ENEL X Way USA ("ENEL"), the vendor of the program chargers, closed its operations in
19 North America as of October 11, 2024, causing the software and networking features that
20 customers and Empire relied upon to remotely access and analyze charging information to no
21 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.

Rebuttal Testimony of
Amanda Arandia

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

2 A. No.

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

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

14 Additionally, as discussed in the Direct Testimony of Sarah L.K. Lange⁹ the EV
15 chargers that were installed under the program are unsupported due to the manufacturer exiting
16 the EV charging market, presenting cybersecurity and operability concerns and compromising
17 the ability of Empire to access customer charging data necessary for bill calculation.

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

19 A. As discussed in the Direct Testimony of Sarah L.K. Lange, Staff recommends
20 freezing the Residential EV Charger Pilot Program after the effective date of rates in this case,
21 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.

Rebuttal Testimony of
Amanda Arandia

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

8 Q. Does this conclude your rebuttal testimony?

9 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)
)
COUNTY OF COLE) ss.

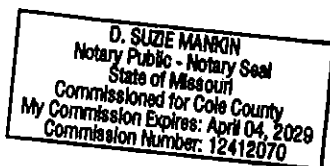
COMES NOW AMANDA ARANDIA and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Rebuttal Testimony of Amanda Arandia*; and that the same is true and correct according to her best knowledge and belief.

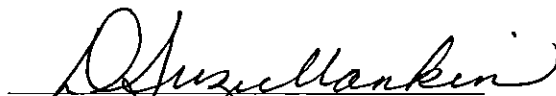
Further the Affiant sayeth not.


AMANDA ARANDIA

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.




Notary Public