Exhibit No. 161

Staff – Exhibit 161
Testimony of Matthew W. Lucas
Surrebuttal
File No. ER-2024-0261

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

SURREBUTTAL TESTIMONY

OF

MATTHEW W. LUCAS

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

CASE NO. ER-2024-0261

Q. Please state your name and business address.

A. My name is Matthew Lucas and my business address is 200 Madison Street, Jefferson City, Missouri 65101.

Q. Are you the same Matthew Lucas who filed rebuttal testimony in this case?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my testimony is to state my general agreement with Empire District Electric Company d/b/a Liberty ("Empire") witness Candice Kelly's position on Renew Missouri's Green Button Connect My Data ("GBC") proposal.

STAFF RESPONSE TO EMPIRE WITNESS CANDICE KELLY

Q. What did Renew Missouri propose in regards to GBC?

A. In his revenue requirement and rate design direct testimonies, Renew Missouri's witness Michael Murray proposed that Empire implement GBC as part of this case, and to include a $201K revenue requirement for the implementation of GBC and participation in a regional data hub.

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,"[1] 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.

[1] 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

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 9th day of September 2025.

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

Notary Public