

EXHIBIT

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Issue(s):

Witness:

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Case Number:

Accounting Authority Order

Kimberly K. Bolin

Rebuttal Testimony

Public Counsel

GU-2005-0095

REBUTTAL TESTIMONY

OF

KIMBERLY K. BOLIN

FILED

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Missouri Public
Service Commission

Submitted on Behalf of
The Office of the Public Counsel

MISSOURI GAS ENERGY

CASE NO. GU-2005-0095

February 4, 2005

Exhibit No. 7
Case No(s) GU-2005-0095
Date 3-8-05 Rptr rr

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of Missouri Gas Energy, a)
division of Southern Union Company, for)
an accounting authority order concerning)
the Kansas property tax for gas in storage.)

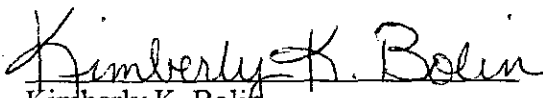
Case No. GU-2005-0095

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)


Kimberly K. Bolin, of lawful age and being first duly sworn, deposes and states:

1. My name is Kimberly K. Bolin. I am a Public Utility Accountant for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony consisting of pages 1 through 13 and Schedule KKB-1.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


Kimberly K. Bolin
Public Utility Accountant I

Subscribed and sworn to me this 4th day of February 2005.

KATHLEEN HARRISON
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan. 31, 2006


Kathleen Harrison
Notary Public

My commission expires January 31, 2006.

REBUTTAL TESTIMONY

OF

KIMBERLY K. BOLIN

MISSOURI GAS ENERGY

CASE NO. GU-2005-0095

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. Kimberly K. Bolin, P.O. Box 2230, Jefferson City, Missouri 65102.

3 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

4 A. I am employed by the Office of the Public Counsel of the State of Missouri (OPC or Public
5 Counsel) as a Public Utility Accountant I.

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

7 A. I graduated from Central Missouri State University in Warrensburg, Missouri, with a Bachelor of
8 Science in Business Administration, major in Accounting, in May, 1993. In April 1995, I attended
9 the National Association of Regulatory Utility Commissioners Rate School held in San Diego,
10 California. I have also attended various utility regulation conferences, seminars and workshops.

11 **Q. WHAT IS THE NATURE OF YOUR CURRENT DUTIES WITH THE OFFICE OF**
12 **THE PUBLIC COUNSEL?**

13 A. Under the direction of the Chief Public Utility Accountant, I am responsible for performing audits
14 and examinations of the books and records of public utilities operating within the state of Missouri.

15 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC**
16 **SERVICE COMMISSION?**

17 A. Yes. Please refer to Schedule KKB-1, attached to this direct testimony, for a listing of cases in
18 which I have previously submitted testimony.

1 Q. IN ANY OF THE CASES LISTED ON SCHEDULE KKB-1 HAVE YOU
2 PREVIOUSLY ADDRESSED THE ISSUE OF WHETHER TO GRANT OR DENY AN
3 ACCOUNTING AUTHORITY ORDER APPLICATION?

4 A. Yes, I have. I submitted testimony in Case No. WO-2002-273 concerning Missouri-American
5 Water Company's Application for an Accounting Authority Order (AAO) for security costs. I have
6 also testified as to the ratemaking treatment afforded an AAO in several rate cases.

7 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

8 A. The purpose of my rebuttal testimony is to express the Public Counsel's concerns and
9 recommendations regarding Missouri Gas Energy's (MGE or Company) request that the Missouri
10 Public Service Commission (Commission) issue an Accounting Authority Order to permit the
11 deferral of property taxes for gas stored in the state of Kansas. I will also respond to comments and
12 recommendations made in the direct testimony of Company witness Michael Noack and Missouri
13 Public Service Commission Staff (Staff) witness Charles Hyneman.

14 Q. WHAT IS AN ACCOUNTING AUTHORITY ORDER?

15 A. An accounting authority order is an accounting mechanism that permits deferral of costs from one
16 period to another. The costs deferred are booked as an asset rather than in a manner that impacts
17 the determination of the return on equity, thus improving the financial picture of the utility in
18 question during the deferral period. During a subsequent rate case, the Commission determines
19 what portion, if any, of the deferred amounts will be recovered in rates. AAOs should be used
20 sparingly because they permit ratemaking consideration of costs from outside the test year.

21 Q. DOES PUBLIC COUNSEL SUPPORT COMPANY'S REQUEST FOR AN
22 ACCOUNTING AUTHORITY ORDER?

1 A. No. The Company's request for an AAO is an attempt to insulate its shareholders from the negative
2 effects of regulatory lag associated with the change in only one expense item that is a **normal and**
3 **recurring** annual expense. Public Counsel also believes that this AAO application is premature in
4 that the Company has not paid the property taxes and is in the process of appealing its lawfulness.
5 MGE may never have to pay this tax.

6 **Q. WHAT HAPPENS WHEN AN EXPENSE IS DEFERRED?**

7 A. When an expense is deferred, it is removed from the income statement and entered on the balance
8 sheet (e.g., Account 182.3, Other regulatory assets), pending the final disposition of these costs at
9 some future time, usually a rate case. The Federal Regulatory Energy Commissions (FERC)
10 Uniform System of Accounts (USOA) Account No. 182.3, Other regulatory assets states:

11 A. This accounts shall include the amounts of regulatory-created
12 assets, not includible in other accounts, resulting from the ratemaking
13 actions of regulatory agencies. (See Definition No. 31)

14 B. The amounts included in this account are to be established by
15 those charges which would have been included in net income, or
16 accumulated other comprehensive income, determinations in the current
17 period under the general requirement of the Uniform System of Accounts
18 but for it being probable that such items will be included in a different
19 period(s) for purposes of developing rates that the utility is authorized to
20 charge for its utility services...

21 **Q. DOES THE MISSOURI PUBLIC SERVICE COMMISSION REQUIRE NATURAL**
22 **GAS COMPANIES IN THE STATE OF MISSOURI TO FOLLOW THE USOA?**

23 A. Yes. Section 4 CSR 240.40.040 of the Missouri Code of State Regulations "directs gas companies
24 within the commission's jurisdiction to use the uniform system of accounts prescribed by the
25 Federal Energy Regulatory Commission for major natural gas companies."

1 Q. HAVE YOU REVIEWED THE FEDERAL ENERGY REGULATORY COMMISSION,
2 UNIFORM SYSTEM OF ACCOUNTS FOR NATURAL GAS COMPANIES?

3 A. Yes, I have.

4 Q. WHICH ACCOUNTS ARE USED TO RECORD PROPERTY TAXES?

5 A. Account 408.1, Taxes Other Than Income Taxes, utility operating income is debited and Account
6 236, Tax Accrued is credited by an estimated amount every month.

7 Q. WHAT MUST THE COMPANY ESTABLISH BEFORE THE COMMISSION WILL
8 GRANT AN AAO?

9 A. The Company must provide evidence that establishes that the costs, which the Company seeks to
10 defer are unique, extraordinary and non-recurring.

11 Q. IN PREVIOUS REPORT AND ORDERS HAS THE COMMISSION EMPHASIZED
12 THAT AAOS MOST PROPERLY ADDRESS ONLY "EXTRAORDINARY AND
13 NONRECURRING" EVENTS?

14 A. Yes. The Commission stated in United Water Missouri, Inc., Case No. WA-98-187, pages 6-7.

15 In order to justify the issuance of an Accounting Authority Order to permit
16 the deferral of such costs, the costs incurred by the utility must result from
17 an event or circumstance that is extraordinary, unusual and unique and not
18 recurring.

19 The Commission also rejected an AAO application in Missouri Public Service Company, Case Nos.
20 EO-91-348 and EO-91-360. The Commission stated:

21 Purchasing power or capacity to meet a company's demand for service is a
22 fundamental undertaking of a regulated utility. A utility must plan for
23 future demand and make a decision of how best to meet that demand.
24 Purchase power capacity contracts which ensure a source of supply of
25 energy for a period are a proper function of management. The fact that

1 these contracts contain rate increases or additional charges as they mature
2 does not render them extraordinary or unique. Costs of other service go
3 up, while other may go down. If the Commission allowed deferral of these
4 costs, then any expense with rising costs could arguably be deferred. As
5 the Commission has discussed earlier, only costs associated with
6 extraordinary, nonrecurring events should be deferred since they are not
7 part of normal operating expenses of a company. Power purchases of this
8 nature are not extraordinary events.

9 The costs associated with the purchase power capacity contracts are
10 recurring expenses. The Commission has established rates based upon
11 both capacity costs and kW's purchased during the test year. The fact that
12 these costs increase based upon the contract does not make them
13 extraordinary. The fact that the contracts were entered into instead of
14 building new peaking capacity does not make them extraordinary. The
15 management of MPS is expected to make prudent and reasonable
16 decisions to meet MPS's need for energy. This is a part of the normal
17 operations of a utility and costs associated with these decisions are normal
18 operating expenses which are recoverable through existing rates.

19
20 Q. WAS THE COMMISSION'S "EXTRAORDINARY AND NONRECURRING"
21 STANDARD, AS OUTLINED IN MISSOURI PUBLIC SERVICE COMPANY,
22 CASE NOS. EO-91-348 AND EO-91-360, AFFIRMED BY THE WESTERN
23 DISTRICT COURT OF APPEALS?

24 A. Yes, the Western District Court of Appeals stated:

25 [An AAO deferral] . . . distorts the balancing process utilized by the
26 commission to establish just and reasonable rates. Because rates are set to
27 recover continuing operating expenses plus a reasonable return on
28 investment, only an extraordinary event should be permitted to adjust the
29 balance . . ." State ex. Rel. Missouri Office of the Public Counsel v.
30 Public Service Commission, 858 S.W. 2d 806 810 (Mo. App. 1993).

31 The Court of Appeals also noted that the Uniform System of Accounts defines "extraordinary
32 items" as:

[t]hose items related to the effects of events and transactions which have occurred during the current period and which are not typical or customary business activities of the company . . . Accordingly, they will be events and transactions of significant effect which would not be expected to recur frequently and which would not be considered as recurring factors on any evaluation of the ordinary operating processes of business. . . Id at 810.

Q. ARE PROPERTY TAXES RECURRING EXPENSES JUST LIKE PURCHASE POWER CONTRACTS?

A. Yes, property taxes just like purchase power contracts are normal ongoing expense items. Property taxes are both typical and customary business activities of most utilities. Property taxes are not extraordinary, unusual and unique. Property tax is a normal cost that is reflected in the income statement each and every month of the year.

Q. ON PAGE 6 OF WITNESS HYNEMAN'S DIRECT TESTIMONY HE STATES, "TAKING INTO ACCOUNT THE ENVIRONMENT IN WHICH MGE OPERATES (A NATURAL GAS DISTRIBUTION COMPANY OPERATING IN THE STATE OF MISSOURI), THE IMPOSITION OF THIS TAX BY A STATE WITHOUT ANY OTHER NEXUS IS CLEARLY UNRELATED TO THE ORDINARY AND TYPICAL ACTIVITIES OF MGE." DO YOU AGREE WITH THIS STATEMENT?

A. No. As a natural gas distribution company, MGE buys gas, stores gas in Kansas, and then distributes the gas to its customers. Storing gas is a normal activity of a gas distribution company. To say that just because a cost (property taxes) of providing gas service has increased makes the cost unrelated to the ordinary and typical activities of MGE is not correct.

Q. ON PAGE 5 OF WITNESS NOACK'S DIRECT TESTIMONY HE STATES, "AN ACCOUNTING AUTHORITY ORDER MAY GENERALLY BE UTILIZED IN SITUATIONS WHERE THE REQUESTING UTILITY HAS INCURRED A COST

1 **THAT IS EXTRAORDINARY, UNUSUAL OR UNIQUE."** **HAS MGE PAID THE**
2 **KANSAS PROPERTY TAX FOR GAS IN STORAGE?**

3 A. No. MGE has not paid the property tax fat issue.. In fact, Company witness Noack states in his
4 direct testimony, "MGE will continue to vigorously oppose the assessment of the tax on the
5 grounds that it is an illegal tax and hopes that it **never becomes an ordinary recurring property**
6 **tax.**" (Emphasis added).

7 **Q. SINCE MGE HAS NOT PAID THIS PROPERTY TAX AND MAY POSSIBLY**
8 **NEVER PAY THIS PROPERTY TAX, IS THIS REQUEST FOR AN AAO**
9 **PREMATURE?**

10 A. Yes. MGE has stated it is vigorously challenging the lawfulness of the tax. According to page 2 of
11 Schedule MRN-2 of witness Noack's direct testimony, MGE is not required to pay the tax until 30
12 days after the Board of Tax Appeals issues its order and the order becomes final.

13 **Q. ACCORDING TO COMPANY WITNESS NOACK WHEN WILL A HEARING BE**
14 **SCHEDULED BEFORE THE KANSAS BOARD OF TAX APPEALS?**

15 A. According to MGE, a hearing will be scheduled in either May or June 2005.

16 **Q. CAN MGE APPEAL THE KANSAS BOARD OF TAX APPEALS DECISION?**

17 A. Yes. MGE can file for judicial review with the Kansas Court of Appeals within 30 days.

18 **Q. THEREFORE THE FINAL DETERMINATION OF WHETHER MGE WILL HAVE TO**
19 **PAY THE PROPERTY TAX IN KANSAS COULD BE UNKNOWN FOR QUITE**
20 **SOME TIME?**

21 A. That is correct.

1 Q. WHAT AMOUNT OF PROPERTY TAX EXPENSE WAS BUILT INTO MGE'S
2 CURRENT RATES?

3 A. \$8,523,843. This amount is a result of a three-year average of the ratio of property taxes paid to
4 taxable property. The resulting ratio was then multiplied by the level of plant-in-service included in
5 rate base to determine the annual property tax expense. (Source: Staff property tax workpapers and
6 Staff true-up accounting schedule in Case No. GR-2004-0209)

7 Q. WHY WAS AN AVERAGE USED TO CALCULATE PROPERTY TAX EXPENSE
8 INSTEAD OF THE TEST YEAR ACTUAL EXPENSE?

9 A. Property taxes are a fluctuating expense. Multiple factors affect the amount of property tax
10 incurred every year. Factors that influence the amount of property tax to be paid are the valuation
11 of property, the level of property owned and the passage of any increase or decrease in property tax
12 rates by a governmental entity.

13 Q. WHAT WAS THE AMOUNT OF PROPERTY TAX PAID BY MGE FOR CALENDAR
14 YEAR 2004?

15 A. MGE paid \$8,214,899 for property tax (not including the Kansas property tax for gas in storage) in
16 calendar year 2004. This amount was \$308,877 less than the amount used to determine the
17 Company's current rates.

18 Q. DO OTHER EXPENSES THAT THE COMPANY INCURS ALSO FLUCTUATE?

19 A. Yes. Most expenses a utility company incurs change from year to year. For example, payroll costs,
20 bad debt expense, outside services expense and maintenance expense. Very few, if any, expenses a
21 utility incurs are the same amount from year to year. Some expenses may increase from one year to
22 another while others may decrease.

1 Q. DO REVENUES ALSO CHANGE FROM YEAR TO YEAR?

2 A. Yes. The number of customers and weather affects revenues.

3 Q. DOES ONE EVENT WHICH RESULTS IN AN EXPENSE OR REVENUE CHANGE
4 OCCUR IN A VACUUM WITH RESPECT TO OTHER POSSIBLE CHANGES IN
5 THE OPERATION OF THE UTILITY?

6 A. No. The overall cost of service is made up of many factors. Isolating or focusing on the change of
7 only one component, such as property taxes, fails to look at all relevant factors in determining the
8 overall cost of service. Other factors may have changed that have a corresponding decrease or
9 increase on the overall cost of service. Unless all factors are analyzed, it is not appropriate to single
10 out one specific event. If MGE is unable to earn its authorized rate of return, then MGE should file
11 for a rate increase.

12 Q. FROM A REGULATORY ACCOUNTING PERSPECTIVE, WHAT OCCURS WHEN AN
13 EXPENSE IS DEFERRED PURSUANT TO AN ACCOUNTING AUTHORITY
14 ORDER?

15 A. From a regulatory accounting perspective, when a cost has been deferred it is not recognized on the
16 income statement as an expense in the current period. The cost is recorded on the balance sheet in a
17 section called Deferred Debits, pending the final disposition at some future point, usually a rate
18 case. These deferred debit accounts act simply as temporary holding site until the appropriate
19 accounting ratemaking treatment can be determined.

20 Q. WHAT IS THE PRACTICAL EFFECT OF AN AAO WITH RESPECT TO HOW A
21 COMPANY REPORTS ITS EARNINGS?

1 A. An AAO allows the Company to "manage" its reported earnings by ignoring costs incurred in a
2 specific period that would have an impact on earnings (always negative). These costs are then
3 included in the determination of earnings for several period in the future and thus minimize the
4 negative impact on reported earnings in any one-year.

5 Q. SHOULD THIS "MANAGEMENT OF EARNINGS" BE A GOAL OF THE
6 COMMISSION?

7 A. No it should not. The Commission's goal in setting rates is to give the company an opportunity to
8 earn a fair and reasonable return, not to guarantee any specific level of earnings or dollar for dollar
9 recovery of every expense incurred by the company.

10 Q. IS THE DEFERRAL OF A COST FROM ONE ACCOUNTING PERIOD TO
11 ANOTHER ACCOUNTING PERIOD FOR THE DEVELOPMENT OF A REVENUE
12 REQUIREMENT CONSISTENT WITH TRADITIONAL RATEMAKING PRACTICES?

13 A. No. Generally, the deferral of costs from one accounting period to another accounting period for
14 the development of a revenue requirement violates the traditional method of setting utility rates.
15 Rates in Missouri are usually established based upon a test period which focuses on four factors: (1)
16 the rate of return the utility has an opportunity to earn; (2) the rate base upon which a return may be
17 earned; (3) the depreciation expense related to plant and equipment; and (4) the allowable operating
18 expenses including income and other taxes.

19 The relationship of the four factors is such that the expenses and rate base necessary to produce the
20 revenues are synchronized. For example, the level of expense is developed based on the expected
21 amount of sales that is used in the determination of revenue for the test period. Similarly, the plant-

1 in-service necessary to produce or deliver water to customers is also based on the customers'
2 demands for the same period. This process is often referred to as the "matching principle."

3 Deferral of expenses or costs from one period to another (and the amortization in subsequent
4 periods) results in costs associated with the production of revenue in one period being charged
5 against the revenue in different unrelated periods. This violates the "matching principle" and if
6 unfettered would allow a utility to manage its earnings in order to avoid regulatory oversight or
7 adverse reactions from the financial community. In my professional opinion, avoiding this
8 possibility is one of the fundamental purposes of Generally Accepted Accounting Principles
9 (GAAP) and the USOA.

10 **Q. WHY IS THE MATCHING PRINCIPLE A CORNERSTONE CONCERN?**

11 A. The litmus test in the regulation of public utilities is rate of return, the same as an equity investor in
12 any publicly held company. GAAP and USOA rules provide a consistent basis for ensuring the
13 revenues received in one period are properly offset with all costs incurred to provide those revenues
14 so that a rate of return can be determined. This matching of revenues and costs to determine rate of
15 return is fundamental to the regulatory processes of setting rates and the subsequent review of the
16 adequacy of rates subsequent to a rate case. Similarly, investors can make decisions after reviewing
17 financial statements (both historic and pro forma) and the resulting rate of returns developed using
18 consistently applied rules that match revenues and costs.

19 **Q. DOES AN AAO VIOLATE THIS MATCHING PRINCIPLE?**

20 A. Yes.

1 Q. HAS THE COMMISSION ALLOWED REGULATED UTILITIES SUCH AS
2 MISSOURI GAS ENERGY TO DEVIATE FROM TRADITIONAL RATEMAKING
3 PRACTICES TO DEFER COSTS FROM ONE ACCOUNTING PERIOD TO
4 ANOTHER ACCOUNTING PERIOD VIA AN ACCOUNTING AUTHORITY ORDER?

5 A. Yes. The Commission has determined that utilities, when warranted, can be allowed to defer costs
6 from prior accounting periods on a limited basis when events occur during a period which are
7 extraordinary, unusual and unique, and nonrecurring.

8 Q. SHOULD THE COMMISSION MERELY CONSIDER THE FINANCIAL IMPACT TO
9 A COMPANY WHEN DECIDING WHETHER TO GRANT AND AAO?

10 A. No.

11 Q. PLEASE EXPLAIN WHY.

12 A. If financial impact was the only consideration, that would open a floodgate of opportunity for
13 utilities to attempt to manage their earnings through the use of an AAO. An event such as an
14 abnormally cool summer or warm winter would have significant impact on earnings. Other
15 significant impacts could occur from any event in the normal course of utility operations that had a
16 material impact on earnings. Other cyclical costs that are normalized for ratemaking treatment but
17 expensed on the utilities financial records include tree trimming expenses for electric utilities, tank
18 painting for water utilities and overtime hours. However, these are not appropriate subjects for an
19 AAO.

20 Q. IF THE AAO IS GRANTED, DOES PUBLIC COUNSEL AGREE WITH STAFF
21 WITNESS HYNEMAN THAT THE AMORTIZATION OF THE AAO BEGIN THE
22 MONTH FOLLOWING A FINAL JUDICIAL RESOLUTION OF THE TAX?

1 A. If the AAO is granted, the amortization of the AAO should begin as soon as the judicial resolution
2 tax is final. If the amortization begins when new tariff rates become effective, the Commission will
3 have effectively determined that it is appropriate to include the amortization expense in the overall
4 cost-of-service (i.e., revenue requirement) used to set rates for some undefined future period in a
5 potential future rate proceeding. This would be improper. Public Counsel does not believe it is
6 appropriate or consistent with past Commission precedent to make such ratemaking determinations
7 in the AAO proceeding.

8 Q. IS BEGINNING THE AMORTIZATION EFFECTIVE WITH THE FINAL
9 RESOLUTION OF THE TAX CONSISTENT WITH THE COMMISSION'S PAST
10 TREATMENT OF AMOUNTS DEFERRED UNDER AN ACCOUNTING AUTHORITY
11 ORDER?

12 A. Yes. In Case No.WO-2002-273, Missouri-American Water Company was required to begin
13 amortization of the amount deferred under the AAO immediately, even though the Company was
14 still accumulating costs. Missouri-American Water Company was allowed to accumulate costs
15 related to security matters through September 2003, but was required to begin the amortization on
16 December 20, 2002.

17 Q. DOES PUBLIC COUNSEL AGREE WITH WITNESS HYNEMAN, THAT IF THE
18 AAO IS GRANTED, IT SHOULD BE AMORTIZED OVER A 60-MONTH
19 PERIOD?

20 A. Yes

21 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

22 A. Yes.

CASE PARTICIPATION
OF
KIMBERLY K. BOLIN

<u>Company Name</u>	<u>Case Number</u>
St. Louis County Water Company	WR-95-145
Missouri-American Water Company	WR-95-205
Steelville Telephone Company	TR-96-123
St. Louis Water Company	WR-96-263
Imperial Utility Corporation	SR-96-427
Missouri-American Water Company	WA-97-45
Associated Natural Gas Company	GR-97-272
St. Louis County Water Company	WR-97-382
Union Electric Company	GR-97-393
Gascony Water Company, Inc.	WA-97-510
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GR-98-374
St. Joseph Light & Power	ER-99-247
	GR-99-246
	HR-99-245
Laclede Gas Company	GR-99-315
Missouri-American Water Company	WR-2000-281
St. Louis County Water Company	WR-2000-844
Osage Water Company	SR-2000-556
	WR-2000-557
Empire District Electric Company	ER-2001-299
Gateway Pipeline Company	GM-2001-585
Warren County Water & Sewer	WC-2002-155
	SC-2002-160
Laclede Gas Company	GR-2001-629
Environmental Utilities	WA-2002-65
Missouri-American Water Company	WO-2002-273
Laclede Gas Company	GR-2002-356
Empire District Electric	ER-2002-424
Missouri American Water Company	WR-2003-0500
Osage Water Company	ST-2003-0562
Missouri Gas Energy	GR-2004-0209
Empire District Electric	ER-2004-0570
Missouri-American/Cedar Hill	SM-2004-0275