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Exhibit No.  
Issues: Riverton In-Service Criteria;  
Witness: Timothy N. Wilson  
Type of Exhibit: True-Up Direct  
Testimony  
Sponsoring Party: Empire District Electric  
Case No.: ER-2016-0023  
Date Testimony Prepared: May 2016

**Before the Public Service Commission  
of the State of Missouri**

**True-Up Direct Testimony**

**Of**

**Timothy N. Wilson**

**May 2016**

Empire Exhibit No. 29-NP  
Date 6-2-16 Reporter KKF  
File No. ER-2016-0023



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OF  
TIMOTHY N. WILSON  
ON BEHALF OF  
THE EMPIRE DISTRICT GAS COMPANY  
BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION

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TRUE-UP DIRECT TESTIMONY  
OF  
TIMOTHY N. WILSON  
ON BEHALF OF  
THE EMPIRE DISTRICT ELECTRIC COMPANY  
BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION  
CASE NO. ER-2016-0023

1 **INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. Timothy N. Wilson. My business address is 602 South Joplin Ave., Joplin,  
4 Missouri.

5 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR JOB TITLE?**

6 A. I am employed by The Empire District Electric Company (“Empire” or  
7 “Company”); where I am Director of Energy Supply Services.

8 **Q. ARE YOU THE SAME TIM WILSON WHO FILED DIRECT TESTIMONY**  
9 **IN THIS CASE ON BEHALF OF EMPIRE?**

10 A. Yes.

11 **EXECUTIVE SUMMARY**

12 **Q. WHAT IS THE PURPOSE OF YOUR TRUE-UP DIRECT TESTIMONY IN**  
13 **THIS CASE BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**  
14 **(“COMMISSION”)?**

15 A. My testimony and exhibits will demonstrate Empire’s Riverton 12 unit has met the  
16 in-service criteria established for the conversion of Riverton 12 to a natural gas-  
17 fired combined cycle generating unit (Riverton 12 NGCC). The in service criteria  
18 is attached to my direct testimony as Schedule TNW-1.

19 **RIVERTON 12 NGCC**

20 **Q. PLEASE BRIEFLY EXPLAIN THE RIVERTON 12 NGCC ADDITION.**

21 A. The Riverton 12 NGCC project involves converting the existing Riverton Unit 12  
22 simple cycle gas turbine, which went into service in 2007, to a combined cycle gas  
23 turbine. The conversion includes the installation of a heat recovery steam  
24 generator, steam turbine generator, auxiliary boiler, cooling tower, and other

1 balance of plant equipment. The Riverton 12 NGCC will be the most efficient  
2 generator in Empire's fleet.

3 **Q. WHAT IS THE CURRENT STATUS OF THE RIVERTON 12 NGCC**  
4 **PROJECT?**

5 A. Major construction, start-up, and commissioning activities are complete, and the  
6 unit went into service on May 1, 2016. Empire project management and operations  
7 personnel have been working with the Commission Staff to validate that the in-  
8 service criteria have been met.

9 **IN-SERVICE CRITERIA**

10 **Q. HOW WERE IN THE IN-SERVICE CRITERIA ESTABLISHED?**

11 A. The in-service criteria, attached to my direct testimony as Schedule TNW-1, were  
12 agreed to between the Company and the Commission Staff. Empire and the  
13 Commission Staff worked together in establishing the in-service criteria prior to the  
14 construction phase of the project. This process was similar to past practice on  
15 previous units Empire has constructed.

16 **Q. HAS EMPIRE MET THE IN-SERVICE CRITERIA ESTABLISHED FOR**  
17 **THE RIVERTON 12 NGCC ADDITION?**

18 A. Yes. All in-service criteria have been met, and the results are attached to this  
19 testimony as Schedule TNW-3.

20 **Q. DOES EMPIRE CONSIDER THE RIVERTON 12 NGCC ADDITION TO BE**  
21 **USED AND USEFUL IN EMPIRE'S PROVISION OF ELECTRIC**  
22 **SERVICE?**

23 A. Yes. As noted above, the unit went into service on May 1, 2016, and the in-service  
24 criteria have been met.

25 **CAPITAL COSTS ASSOCIATED WITH NEW PLANT IN-SERVICE**

26 **Q. HAVE THE CAPITAL COSTS ASSOCIATED WITH THE RIVERTON 12**  
27 **NGCC ADDITION BEEN INCLUDED IN THE REVENUE REQUIREMENT**  
28 **IN THIS RATE CASE?**

29 A. Yes. Empire included an estimate of the capital costs associated with the Riverton  
30 12 NGCC addition.

1 Q. WHAT LEVEL OF RIVERTON 12 NGCC EXPENDITURES SHOULD BE  
2 REFLECTED IN THIS CASE?

3 A. In total, as of March 31, 2016, Empire's investment in Riverton 12 NGCC is  
4 \$175,637,605, which includes incurred capital expenditures and AFUDC. The  
5 Missouri jurisdictional share of this investment is approximately 85.79% or  
6 \$150,687,581 million. Empire witness John Woods describes the expected  
7 operations and maintenance costs associated with Riverton 12 NGCC in his direct  
8 and rebuttal testimonies.

9 Q. DOES THIS CONCLUDE YOUR TRUE-UP DIRECT TESTIMONY?

10 A. Yes, it does.

