

Missouri Public Service Commission

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Data Center
Missouri Public
Service Commission

Respond Data Request

Empire Exhibit No. 207
Date 10-10-17 Reporter A.F.
File No. EO-2017-0277

Data Request No.	0007
Company Name	MO PSC Staff-(All)
Case/Tracking No.	EO-2017-0277
Date Requested	9/20/2017
Issue	Quality of Service - Customer Service
Requested From	Dan Beck
Requested By	Diana C Carter
Brief Description	Questions pertaining to Rebuttal Testimony of Staff witness Dan Beck.
Description	DR7: Are Empire's remaining customers harmed when customers leave the system? Please explain your answer.
Response	From a strictly economic viewpoint, the loss of contributions to the fixed costs of Empire would be a harm, in the long term, if a customer left the system. However, since harm is not just economic, and other harms could be either positive or negative, Staff is unable to answer the question. Staff notes that Empire's tariff has a section titled "Termination of Service." A customer has the right to leave the system under this section of the tariff. If the simple economic concept that a customer leaving the system is a harm was the only thing to consider, then it would be illogical to allow any customer to "terminate service." However, allowing termination of service is part of Empire's tariff that the Commission has determined is just and reasonable. Response provided by Dan Beck (dan.beck@psc.mo.gov).
Objections	NA

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission if, during the pendency of Case No. EO-2017-0277 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the MO PSC Staff-(All) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to MO PSC Staff-(All) and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Public
Rationale : NA

EXHIBIT
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