

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



In the Matter of the Sixth Prudence Review of )  
Costs Subject to the Commission-Approved )  
Fuel Adjustment Clause of The Empire District )  
Electric Company. )

**Case No. EO-2017-0065**

FILED  
September 1, 2017  
Data Center  
Missouri Public  
Service Commission

**ADDENDUM TO SUPPLEMENT STAFF'S SIXTH FUEL ADJUSTMENT CLAUSE  
PRUDENCE AUDIT REPORT OF THE EMPIRE DISTRICT ELECTRIC COMPANY**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and submits its *Addendum To Supplement Staff's Sixth Fuel Adjustment Clause Prudence Audit Report of The Empire District Electric Company* ("Addendum").

1. This Addendum contains the credentials of Staff witnesses David Roos, Ashley Sarver, and J Luebbert. These Staff witnesses are the affiants who contributed to the preparation of the verified *STAFF REPORT* on the *SIXTH PRUDENCE REVIEW OF COSTS RELATED TO THE FUEL ADJUSTMENT CLAUSE FOR THE ELECTRIC OPERATIONS OF THE EMPIRE DISTRICT ELECTRIC COMPANY* for the period of March 1, 2015 through August 31, 2016 ("Staff's Report").

2. Staff's Report was filed on February 28, 2017. As a result of Staff's prudence review of the fuel adjustment clause ("FAC") costs of The Empire District Electric Company, the Staff identified no evidence of imprudence on the part of Empire.

3. On March 10, 2017, the Office of Public Counsel filed its Motion for Evidentiary Hearing which led to the Commission ordering a procedural schedule on April 6, 2017.

4. The procedural schedule set the parties' filing of direct testimony no later than May 19, 2017.

Staff Exhibit No. 201  
Date 8-24-17 Reporter A.C.  
File No. EO 2017-0065

5. By this pleading the Staff informs the Commission and the parties that the verified Staff's Report filed February 28, 2017 in Highly Confidential and Public formats and this Addendum represent the combined direct testimony of Staff witnesses Roos, Sarver, and Luebbert.

**WHEREFORE**, the Staff prays the Commission accept its Addendum containing the credentials of the Staff's witnesses who prepared and verified Staff's Report filed February 28, 2017, and accept Staff's Report with this Addendum for its direct testimony in the instant case.

Respectfully submitted,  
**/s/ Robert S. Berlin**  
Deputy Staff Counsel  
Missouri Bar No. 51709  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 526-7779 (Telephone)  
(573) 751-9285 (Fax)  
bob.berlin@psc.mo.gov (e-mail)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 19<sup>th</sup> day of May, 2017.

**/s/ Robert S. Berlin**

## **Credentials and Background of**

### **J Luebbert**

I have a Bachelor of Science degree in Biological Engineering from the University of Missouri. My work experience includes three years of regulatory work as an Environmental Engineer II for the Air Pollution Control Program of the Missouri Department of Natural Resources.

I am currently employed as a Utility Engineering Specialist III in the Engineering Resources Department of the Commission Staff Division of the Missouri Public Service Commission. I have been employed at the Missouri Public Service Commission since March 2016 and am responsible for preparing staff recommendations regarding electric utility resource planning, demand-side management programs, and fuel adjustment clauses.

| <b>Case Number</b> | <b>Company</b>                    | <b>Issues</b>  |
|--------------------|-----------------------------------|--|
| EO-2016-0228       | Ameren Missouri                   | Utilization of Generation Capacity, Plant Outages, and Demand Response Program |
| ER-2016-0179       | Ameren Missouri                   | Heat Rate Testing  |
| ER-2016-0285       | Kansas City Power & Light Company | Heat Rate Testing  |
| EO-2017-0065       | Empire District Electric          | Utilization of Generation Capacity and Station Outages                         |

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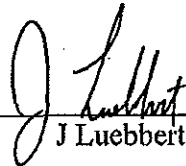
Case No. EO-2017-0065

**AFFIDAVIT OF J LUEBBERT**

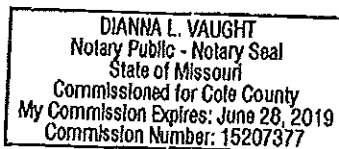
STATE OF MISSOURI )  
 ) ss  
COUNTY OF COLE )

**COMES NOW**, J Luebbert and on his oath declares that he is of sound mind and lawful age; that he contributed to the *Sixth Prudence Review of Costs Related to the Fuel Adjustment Clause for the Electric Operations of the Empire District Electric Company, March 1, 2015 through August 31, 2016*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
J Luebbert

Subscribed and sworn to be this 19th day of May, 2017.



  
Notary Public

## **David C. Roos**

**Present Position:** I am a Regulatory Economist III in the Energy Resource Department, Commission Staff Division of the Missouri Public Service Commission.

### **Educational Background and Work Experience:**

In May 1983, I graduated from the University of Notre Dame, Notre Dame, Indiana, with a Bachelor of Science Degree in Chemical Engineering. I also graduated from the University of Missouri in December 2005, with a Master of Arts in Economics. I have been employed at the Missouri Public Service Commission as a Regulatory Economist III since March 2006. I began my employment with the Commission in the Economics Analysis section where my responsibilities included class cost of service and rate design. In 2008, I moved to the Energy Resource Analysis section where my testimony and responsibility topics include energy efficiency, resource analysis, and fuel adjustment clauses. Prior to joining the Public Service Commission I taught introductory economics and conducted research as a graduate teaching assistant and graduate research assistant at the University of Missouri. Prior to the University of Missouri, I was employed by several private firms where I provided consulting, design, and construction oversight of environmental projects for private and public sector clients.

### **Previous Cases**

| <b><u>Company</u></b>               | <b><u>Case No.</u></b> |
|-------------------------------------|------------------------|
| Empire District Electric Company    | ER-2006-0315           |
| AmerenUE                            | ER-2007-0002           |
| Aquila Inc.                         | ER-2007-0004           |
| Kansas City Power and Light Company | ER-2007-0291           |
| AmerenUE                            | EO-2007-0409           |
| Empire District Electric Company    | ER-2008-0093           |
| Kansas City Power and Light Company | ER-2008-0034           |
| Greater Missouri Operations         | HR-2008-0340           |

**Previous Cases**

| <u><b>Company</b></u>                     | <u><b>Case No.</b></u> |
|---|------------------------|
| Greater Missouri Operations               | ER-2009-0091           |
| Greater Missouri Operations               | EO-2009-0115           |
| Greater Missouri Operations               | EE-2009-0237           |
| Greater Missouri Operations               | EO-2009-0431           |
| Empire District Electric Company          | ER-2010-0105           |
| Greater Missouri Operations               | EO-2010-0002           |
| AmerenUE                                  | ER-2010-0036           |
| AmerenUE                                  | ER-2010-0044           |
| Empire District Electric Company          | EO-2010-0084           |
| Empire District Electric Company          | ER-2010-0105           |
| AmerenUE                                  | ER-2010-0165           |
| Greater Missouri Operations               | EO-2010-0167           |
| AmerenUE                                  | EO-2010-0255           |
| Greater Missouri Operations (Aquila)      | EO-2008-0216           |
| Ameren Missouri                           | ER-2011-0028           |
| Empire District Electric Company          | EO-2011-0066           |
| Empire District Electric Company          | EO-2011-0285           |
| Ameren Missouri                           | EO-2012-0074           |
| Greater Missouri Operations               | EO-2012-0009           |
| Ameren Missouri                           | EO-2012-0142           |
| Ameren Missouri                           | ER-2012-0166           |
| Greater Missouri Operations               | EO-2013-0325           |
| Ameren Missouri                           | EO-2013-0407           |
| Empire District Electric Company          | EO-2014-0057           |
| Greater Missouri Operations               | EO-2014-0256           |
| Empire District Electric Company          | ER-2014-0351           |
| Greater Missouri Operations               | EO-2015-0252           |
| Kansas City Power and Light Company       | EO-2015-0254           |
| Empire District Electric Company          | ER-2015-0214           |
| Greater Missouri Operations               | EO-2016-0053           |
| Empire District Electric Company          | ER-2016-0023           |
| KCP&L Greater Missouri Operations Company | ER-2016-0156           |
| KCPL                                      | ER-2016-0285           |

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**AFFIDAVIT OF DAVID C. ROOS**


STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

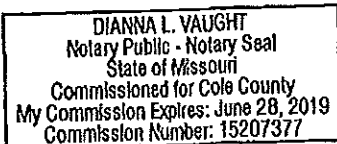
**COMES NOW**, David C. Roos and on his oath declares that he is of sound mind and lawful age; that he contributed to the *Sixth Prudence Review of Costs Related to the Fuel Adjustment Clause for the Electric Operations of the Empire District Electric Company, March 1, 2015 through August 31, 2016*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
David C. Roos

Subscribed and sworn to be this 18th day of May, 2017.

  
\_\_\_\_\_  
Notary Public



# Ashley Sarver

## Educational, Employment Background and Credentials

I am a Utility Regulatory Auditor IV in the Auditing Department, Commission Staff Division for the Missouri Public Service Commission (Commission). I transferred to the position January 2017. I promoted to a Utility Regulatory Auditor IV in August 2016 in the Energy Resources Department, Commission Staff Division for the Commission. I accepted the position of the Utility Regulatory Auditor I/II/III in July 2013 with the Auditing Department.

I earned a Bachelor of Science degree in Accounting from Missouri State University in Springfield, MO in July 2009. In earning this degree I completed numerous core Accounting and business classes. Prior to joining the Commission, I was employed by the State of Missouri - Department of Corrections from 2009 to 2013 as an Auditor.

## Case Participation

| Company Name   | Case Number(s)               | Testimony/Issues   |
|--|------------------------------|--|
| Kansas City Power & Light Company  | ER-2016-0285                 | Fuel Adjustment Clause Base Factor   |
| Empire District Electric Company   | EO-2017-0094<br>ER-2017-0092 | Fuel Adjustment Rate, Accumulation Period 16 of its Fuel Adjustment Clause   |
| KCP&L Greater Missouri Operations Company                                    | ER-2016-0156                 | Miscellaneous Revenues and Customer Growth   |
| Hillcrest Utility Operating Company, Inc.                                    | WR-2016-0064<br>SR-2016-0065 | Revenue, Expenses, and Rate Base   |
| The Empire District Electric Company   | ER-2016-0023                 | Property Tax Expense, Rate Case Expense, Injuries and Damages, Workman's Compensation, Bad Debt Expense, Amortization of Stock Issuance Expense Amortization, Lease Expense, DSM/PRE-MEEIA, Solar Rebate, Revenue, Customer Growth |
| Indian Hills Utility Operating Company, Inc. to Acquire I.H. Utilities, Inc. | WO-2016-0045                 | Acquisition Case: Rate Base determination  |



| Company Name                         | Case Number(s)               | Testimony/Issues   |
|--------------------------------------|------------------------------|--|
| The Empire District Electric Company | ER-2014-0351                 | Revenue, Customer Growth, Common Stock Issuance Expense Amortization, Uncollectible Accounts, Cash Working Capital, Injuries and Damages, Workman's Compensation, Insurance Expense, Lease Expense, Property Tax Expense, Regulatory Commission Expense  |
| Summit Natural Gas of Missouri, Inc. | GR-2014-0086                 | Plant in Service, Depreciation Reserve, Gas Stored Inventory, Prepayments and Materials and Supplies Inventory, Customer Advances, Customer Deposits, Payroll, Payroll Taxes, 401(k), and Other Employee Benefit Costs, Incentive Compensation and Bonuses, Customer Deposit Interest Expense, Maintenance Normalization Adjustments, Advertising Expense, Regulatory Expenses, Dues, Rent Expense |
| Lake Region Water and Sewer          | WR-2013-0461<br>SR-2013-0459 | Plant in Service, Depreciation Reserve, Materials and Supplies Inventory, Customer Advances, Contributions in Aid of Construction, Purchase Power, Chemicals, Testing Expense, Supplies and Materials, Tools and Shop Supplies, Insurance, Office Supplies, Telephone, License and Permits, Property Tax   |

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AFFIDAVIT OF ASHLEY SARVER


STATE OF MISSOURI )  
 ) ss  
COUNTY OF COLE )

**COMES NOW**, Ashley Sarver and on her oath declares that she is of sound mind and lawful age; that she contributed to the *Sixth Prudence Review of Costs Related to the Fuel Adjustment Clause for the Electric Operations of the Empire District Electric Company, March 1, 2015 through August 31, 2016*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
Ashley Sarver

Subscribed and sworn to be this 18th day of May, 2017.

  
\_\_\_\_\_  
Notary Public

