

Missouri Public Service Commission

FILED
October 16, 2017
Data Center
Missouri Public
Service Commission

Respond Data Request

Data Request No.	0004	<u>Empire Exhibit No. 204</u> <u>Date 10-10-17 Reporter A.F.</u> <u>File No. EO-2017-0277</u>
Company Name	MO PSC Staff-(All)	
Case/Tracking No.	EO-2017-0277	
Date Requested	9/20/2017	
Issue	Other - Other	
Requested From	Dan Beck	
Requested By	Diana C Carter	
Brief Description	Questions pertaining to Rebuttal Testimony of Staff witness Dan Beck.	
Description	DR4: (a) Is it Staff's opinion that Empire never commenced providing electric service to a facility located on the property now owned by the Jessips? (b) If this is not Staff's opinion, please state the date Staff believes Empire commenced providing electric service to a facility located on the property and describe what Staff believes is that "facility."	
Response	a) No. b) The Rebuttal Testimony of Patsy J. Mulvaney includes the following Q/A: 9 Q. WHEN DID EMPIRE FIRST PROVIDE ELECTRIC SERVICE TO THE 10 PROPERTY? 11 A. January 1, 1980. 12 Q. WHAT STRUCTURES WERE LOCATED ON THE PROPERTY AT THAT 13 TIME? 14 A. At that time, a house and a barn were located on the Property. Staff does not dispute this statement. However, while the statement discusses a house and a barn, it does not state that those structures were being served with electricity at that time nor does it show that the house and barn in 1980 are the same house and barn that now exist. Based on conversations with Mr. Jessip, he has no knowledge of the property prior to when he purchased it, which was at least 30 years after the Empire-provided January 1, 1980 date. Staff also has no knowledge of this property prior to 2017, so Staff is unable to specifically define the structures on the property that were being served in 1980. Staff notes that Schedule DB-r3 of the Direct Testimony is Daniel I. Beck, PE shows at least one other out-building on the property, and his testimony discuss the presence of a well on the property. Both Empire's witness Patsy J. Mulvaney and Mr. Jessip discuss the presence of the well in their testimonies. 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:

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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