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John J. Spanos
Rebuttal Testimony (Gas)
File Nos. ER-2021-0240 & GR-2021-0241

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Issue: Depreciation
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Witness: John J. Spanos
Sponsoring Party: Ameren Missouri
Case No.: GR-2021-0241
Date: October 15, 2021

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. GR-2021-0241

REBUTTAL TESTIMONY OF

JOHN J. SPANOS

ON BEHALF OF

AMEREN MISSOURI

Camp Hill, Pennsylvania

October 15, 2021

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I. INTRODUCTION AND PURPOSE

2 Q. PLEASE STATE YOUR NAME AND ADDRESS.

3 A. My name is John J. Spanos. My business address is 207 Senate Avenue, Camp Hill,
4 Pennsylvania.

5 Q. DID YOU FILE DIRECT TESTIMONY IN THIS MATTER?

6 A. No. However, my depreciation study was sponsored by Company witness, Mitchell
7 Lansford.

8 Q. ARE YOU ASSOCIATED WITH ANY FIRM?

9 A. Yes. I am associated with the firm of Gannett Fleming Valuation and Rate
10 Consultants, LLC (“Gannett Fleming”).

11 Q. HOW LONG HAVE YOU BEEN ASSOCIATED WITH GANNETT
12 FLEMING?

13 A. I have been associated with the firm since June, 1986.

14 Q. WHAT IS YO

15 A. I am President.

16 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?

17 A. I am testifying on behalf of Ameren Missouri ("Am

18 **Q. PLEASE STATE YOUR QUALIFICATIONS.**

19 A. I have over 35 years of utility depreciation experience, which includes providing
20 expert testimony in over 380 cases before approximately 41 regulatory commissions,
21 including this Commission. These cases have included depreciation studies in the

1 valuation assignments. Please refer to Schedule JJS-R1 for my qualifications
2 statement, which includes further information regarding my work history, case
3 experience and leadership in the Society of Depreciation Professionals.

4 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

5 A. The purpose of my testimony is to rebut two aspects of the Staff Report filed by the
6 Missouri Public Service Commission Staff (“Staff”) related to depreciation. First, I
7 will rebut the proposed life and net salvage estimate adjustments proposed by Staff.
8 Second, I will rebut the accounts to which Staff proposed reallocation of the negative
9 accumulated reserve associated with Accounts 305.00, Structures and Improvements;
10 311.00, Liquefied Petroleum Gas Equipment; and 387.00, Other Equipment. Finally,
11 I will address the handling of AMI gas modules for the smart meter program.

12 **Q. WHAT IS THE SUBJECT OF YOUR REBUTTAL TESTIMONY?**

13 A. The subject of my testimony is depreciation. Specifically, I will address Staff’s
14 proposed life and net salvage estimate adjustments, and Staff’s reallocation of
15 negative accumulated reserve.

16 **II. STAFF’S PROPOSED ADJUSTMENTS TO LIFE AND NET SALVAGE**
17 **ESTIMATES**

18 **A. LIFE ESTIMATES**

19 **Q. WHAT ADJUSTMENTS TO THE COMPANY PROPOSED LIFE**
20 **ESTIMATES IS STAFF PROPOSING?**

21 A. Staff proposes to adjust the life estimate set forth in the Depreciation Study for seven
22 Accounts. Table 1 below sets forth the life estimates proposed by the Company in the
23 Depreciation Study and those proposed by Staff by FERC Account.

TABLE 1.
COMPANY PROPOSED VS. STAFF PROPOSED LIFE ESTIMATES

ACCOUNT	COMPANY PROPOSED LIFE ESTIMATE	STAFF PROPOSED LIFE ESTIMATE
369 MEASURING AND REGULATING STATION EQUIPMENT	45-R2.5	50-R3
375 STRUCTURES AND IMPROVEMENTS	45-R2	50-R2
376 MAINS	58-S1.5	60-L2.5
380 SERVICES	47-S0.5	60-L1
383 HOUSE REGULATORS	45-R3	47-L3
390 STRUCTURES AND IMPROVEMENTS	38-R2	38-R1
392 TRANSPORTATION EQUIPMENT	13-S1.5	13-L2.5

2 **Q. HAS STAFF PROVIDED ANY EXPLANATION OR JUSTIFICATION FOR
3 ITS PROPOSED ADJUSTMENTS?**

4 A. No. Staff provides no explanation of or support for its proposed adjustments to the
5 life estimates for the accounts set forth in Table 1 above.

6 **Q. DO YOU AGREE WITH THE LIFE ESTIMATES STAFF HAS PROPOSED
7 AS SET FORTH IN TABLE 1 ABOVE?**

8 A. No.

9 **Q. WHAT IS THE MAIN ISSUE WITH THE LIFE PROPOSALS MADE BY
10 STAFF?**

11 A. The major issue with the service life proposals made by Staff is that the overall life
12 cycle for each asset class is not reasonable. A survivor curve should reflect the overall
13 life cycle of the assets as each curve should reflect the matching of the utilization of
14 the asset with the recovery of the asset. For many of the accounts that Staff
15 recommends a different survivor curve, it is clear this critical component of life
16 estimation is not considered.

1 As will be discussed in the account analysis below, Staff appears to base its
2 proposals purely on mathematical results, contrary to the way proper life analysis
3 should be conducted. Additionally, Staff's proposals are an excessive change in the
4 life cycle that is currently being utilized by the Company given the five-year span
5 since the time the last parameters were approved.

6 **Q. DO ANY DEPRECIATION AUTHORITIES SUPPORT THAT THE**
7 **ESTIMATION OF SERVICE LIVES SHOULD BE BASED ON MORE THAN**
8 **MATHEMATICAL RESULTS?**

9 A. Yes. For example, NARUC makes clear that factors other than the statistical analysis
10 must be considered. Chapter XIII of *Public Utility Depreciation Practices*, entitled
11 “Actuarial Life Analysis” discusses and emphasizes the subjective nature of the
12 process of estimating service lives. NARUC starts this chapter by explaining that the
13 analysis of historical data is only one part of the process of estimating service lives:

14 Actuarial analysis objectively measures how the company has retired
15 its investment. The analyst must then judge whether this historical
16 view depicts the future life of the property in service. The analyst takes
17 into consideration various factors, such as changes in technology,
18 services provided, or capital budgets.¹

19
20 NARUC makes clear that the process of estimating service lives must go beyond any
21 objective measurement of the past. In describing the determination of a survivor curve
22 estimate (referred to as the “projection life” in this passage), NARUC states:

23 The projection life is a projection, or forecast, of the future of the
24 property. Historical indications may be useful in estimating a
25 projection life curve. Certainly the observations based on the
26 property's history are a starting point. Trends in life or retirement
27 dispersion can often be expected to continue. Likewise, unless there is
28 some reason to expect otherwise, stability in life or retirement

¹ National Association of Regulatory Utility Commissioners, *Public Utility Depreciation Practices*, 1996, p. 111.

1 dispersion can be expected to continue, at least in the near term.
2

3 Depreciation analysts should avoid becoming ensnared in the
4 mechanics of the historical life study and relying solely on
5 mathematical solutions. The reason for making an historical life
6 analysis is to develop a sufficient understanding of history in order to
7 evaluate whether it is a reasonable predictor of the future. The
8 importance of being aware of circumstances having direct bearing on
9 the reason for making an historical life analysis cannot be understated.
10 These circumstances, when factored into the analysis, determine the
11 application and limitations of an historical life analysis.²
12

13 Thus, NARUC strongly advises against the apparent approach used by Staff, clearly
14 stating that “relying solely on mathematical solutions” should be avoided. NARUC
15 further elaborates on the need for a subjective component to forecasting service lives:

16 A depreciation study is commonly described as having three periods of
17 analysis: the past, present, and future. The past and present can usually
18 be analyzed with great accuracy using many currently available
19 analytical tools. The future still must be predicted and must largely
20 include some subjective analysis. Informed judgment is a term used to
21 define the subjective portion of the depreciation study process. It is
22 based on a combination of general experience, knowledge of the
23 properties and a physical inspection, information gathered throughout
24 the industry, and other factors which assist the analyst in making a
25 knowledgeable estimate.
26

27 The use of informed judgment can be a major factor in forecasting. A
28 logical process of examining and prioritizing the usefulness of
29 information must be employed, since there are many sources of data
30 that must be considered and weighed by importance. For example, the
31 following forces of retirement need to be considered: Do the past and
32 current service life dispersions represent the future? Will scrap prices
33 rise or fall? What will be the impact of future technological
34 obsolescence? Will the company be in existence in the future? The
35 analyst must rank the factors and decide the relative weight to apply to
36 each. The final estimate might not resemble any one of the specific
37 factors; however, the result would be a decision based upon a
38 combination of the components.³
39

² National Association of Regulatory Utility Commissioners, *Public Utility Depreciation Practices*, 1996, p. 126. Emphasis added.

³ National Association of Regulatory Utility Commissioners, *Public Utility Depreciation Practices*, 1996, p. 128. Emphasis added.

1 **Q. HAVE YOU INCORPORATED THE VARIOUS FACTORS DISCUSSED BY**
2 **NARUC INTO YOUR ESTIMATES?**

3 A. Yes. In prior studies, site visits were conducted. In this study, and prior studies,
4 discussions with Company personnel were conducted to familiarize myself with the
5 Company's assets. In addition, throughout my career, I have performed hundreds of
6 depreciation studies for numerous utilities. The information obtained from this
7 experience has also been incorporated into my recommendations.

8 **Q. PLEASE ILLUSTRATE THE ISSUES IN THE LIFE ESTIMATES SET**
9 **FORTH BY STAFF.**

10 A. Accounts 376 (Mains) and 380 (Services) will be used to illustrate why the survivor
11 curves recommended by the Company are more reasonable than those proposed by
12 Staff for these asset classes.

13 **Q. WHAT WERE THE SURVIVOR CURVE PROPOSALS RELATED TO**
14 **ACCOUNT 376 (MAINS)?**

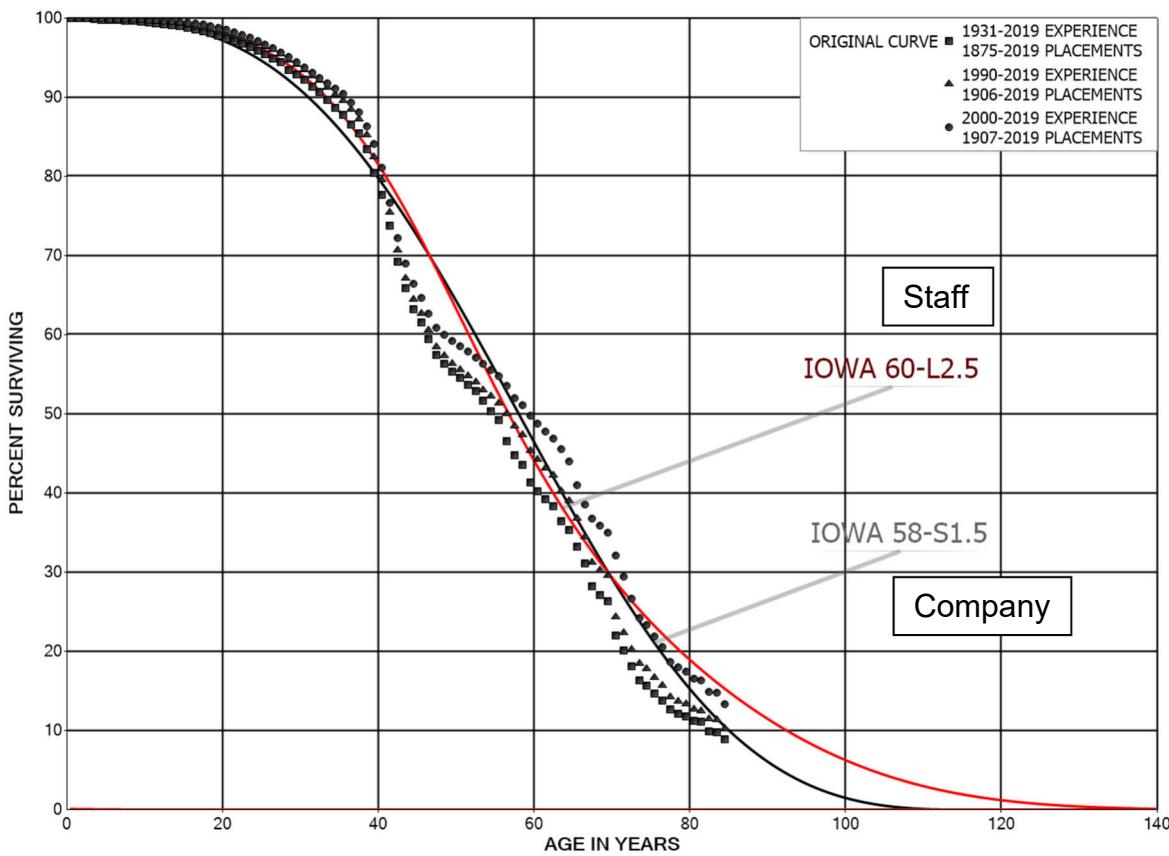
15 A. The Company proposes the 58-S1.5 survivor curve while Staff proposes to utilize the
16 60-L2.5 survivor curve. The currently approved estimate is the 50-R3 survivor curve
17 which means not only has Staff increased the average life by 12 years but the overall
18 life cycle by 60 years.

19 **Q. PLEASE EXPLAIN WHY THE COMPANY PROPOSED SURVIVOR CURVE**
20 **SHOULD BE ACCEPTED INSTEAD OF THE STAFF PROPOSED**
21 **SURVIVOR CURVE.**

22 A. As mentioned above, the 60-L2.5 proposed by Staff appears to be based solely on
23 mathematical curve fitting results or at least the type curve was selected based solely

1 on mathematical curve fitting. The 56-L2.5 survivor curve is the best statistical fit but
2 that does not mean any average life with that curve is the best fit. There are more
3 components than mathematical curve fitting involved with proper life analysis, and
4 many factors in addition to mathematical fitting indications to be considered. Please
5 see Figure 1 below for a comparison of the proposed survivor curves for this account,
6 using the most representative data points which were shown in the depreciation study.
7 For this account, the data points I have emphasized are those which have more than
8 \$20,000 in investment. These are also most of the data points for which the
9 retirements by age are still reliable as compared to the exposures. The older data
10 points are less relevant for this account when determining life characteristics of mains
11 in service today.

Figure 1: Comparison of Company and Staff Proposed Survivor Curves for Account 376.00, Mains



In the chart above, both curves are relatively close to the data for the three bands considered for analysis. However, there are some key details that favor the Company's estimate over Staff's. First, the currently approved estimate for this account is the 50-R3 survivor curve so an increase in average service life of 12 years is excessive for this type of asset particularly with the effort to address replacing older, leak-prone pipe. So an 8 year average life is already fairly large given the last study was only 5 years ago. The other key factor Staff does not appear to have considered is the full life cycle of their estimate. Staff's proposed survivor curve recommends an average life of 60 years and maximum life of 140 years of age — these are not a realistic combination for the types of assets in this account nor a reasonable plan for

1 the future of these assets. Further, Staff's survivor curve suggests that close to 20
2 percent of the assets in this account will survive to be over 80 years of age and that it
3 will take 60 additional years for the rest of the 20 percent of mains that made it 80
4 years to be retired. Staff's recommendation does not result in a reasonable life cycle
5 for this account. Instead, the estimate used by the Company, the 58-S1.5 survivor
6 curve, is the most appropriate estimate for this account.

7 **Q. WHAT WERE THE SURVIVOR CURVE PROPOSALS RELATED TO**
8 **ACCOUNT 380 (SERVICES)?**

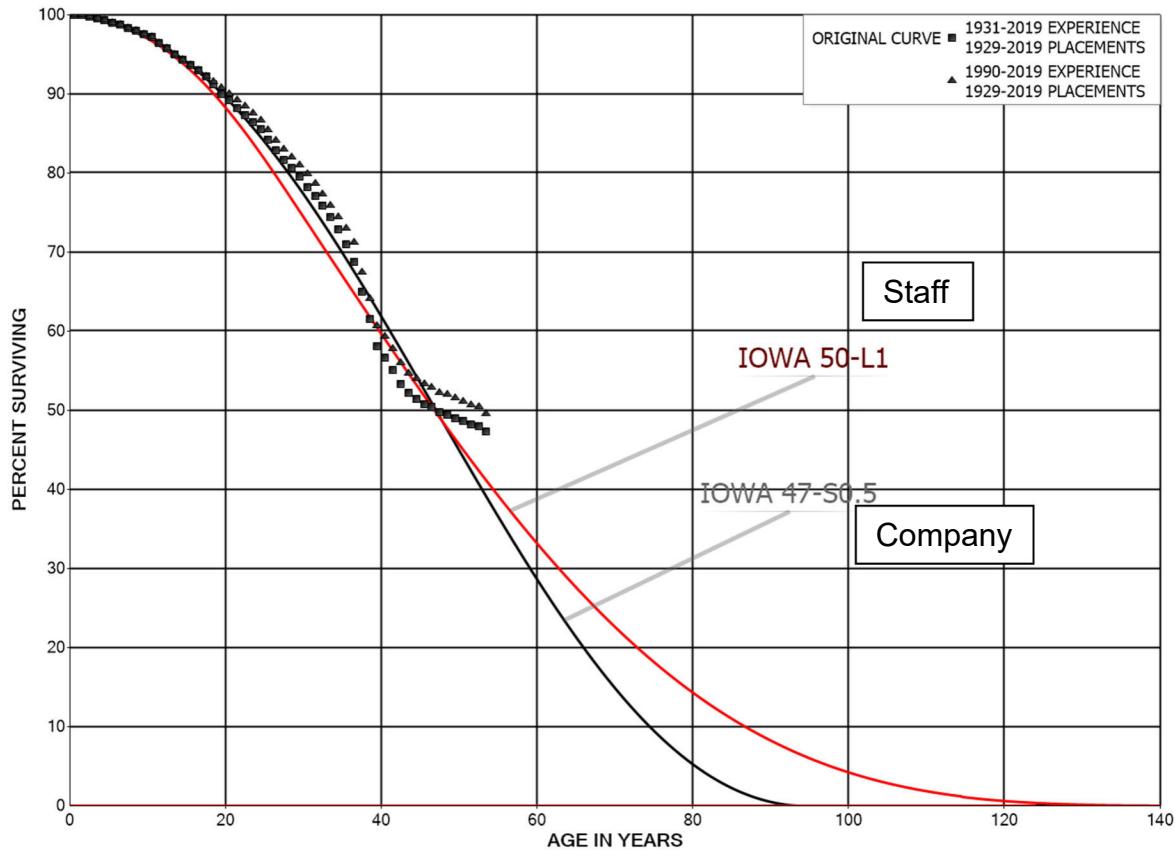
- 9 A. The Company proposed the 47-S0.5 survivor curve for this account, while Staff
10 proposed the 50-L1 survivor curve.

11 **Q. PLEASE EXPLAIN WHY THE COMPANY'S SURVIVOR CURVE IS THE**
12 **MOST APPROPRIATE FOR THIS ACCOUNT.**

- 13 A. Figure 2 below sets forth the comparison the Company's 47-S0.5 survivor curve to
14 the 50-L1 survivor curve proposed by Staff for Account 380, Services. The 47-S0.5
15 survivor curve is a much better representation of the significant portion of the
16 historical data for this account. Staff appears to emphasize a very small percentage of
17 the gas services when considering the 50-L1 type curve. The exposures for this
18 account begin at age 0 with 160,882,613 and the significant portion of the life cycle
19 can be reflected through age 53.5 which has 277,613 exposures. The 47-S0.5 is the
20 best statistical fit for these assets and represents an appropriate life cycle with a
21 maximum life of 90 years. In contrast, the 50-L1 type curve selected by Staff
22 anticipates that retirements will decrease with age after age 50 and that some gas
23 services will still be in service to age 130. It is not reasonable to expect that 33 percent

1 of gas services will last 60 years and some of those that have made it to year 60 will
2 last another 70 years. Therefore, the 47-S0.5 is the more appropriate estimate for this
3 account.

4 **Figure 2: Comparison of Company and Staff Proposed Survivor Curves for**
5 **Account 380.00, Services**



B. NET SALVAGE ESTIMATES

Q. WHAT ADJUSTMENTS TO COMPANY PROPOSED NET SALVAGE ESTIMATES IS STAFF PROPOSING?

A. Staff proposes adjustments to the Company proposed net salvage estimates for two FERC Accounts. For Account 376 (Mains), the Company has proposed a net salvage estimate of negative 10%, and Staff has proposed a net salvage estimate of negative

1 5%. For Account 381 (Meters), the Company has proposed a net salvage estimate of
2 positive 2%, and Staff has proposed a net salvage estimate of positive 3%.

3 **Q. HAS STAFF PROVIDED ANY EXPLANATION OR JUSTIFICATION FOR**
4 **ITS PROPOSED ADJUSTMENTS?**

5 A. No. Staff provides no explanation of or support for its proposed adjustments to the
6 net salvage estimates proposed by the Company.

7 **Q. IS THERE ANY REASON TO AGREE TO THE NET SALVAGE ESTIMATES**
8 **STAFF HAS PROPOSED FOR FERC ACCOUNTS 376 AND 381?**

9 A. No.

10 **Q. WHY DO YOU DISAGREE WITH NET SALVAGE ESTIMATES STAFF HAS**
11 **PROPOSED FOR FERC ACCOUNTS 376 AND 381?**

12 A. I will begin with Account 376.00 (Mains). The Depreciation Study presents net
13 salvage activity for the period 1984 through 2019. As described in Part IV of the
14 Depreciation Study, determination of the most appropriate net salvage percent for
15 future assets must include a combination of statistical analysis and informed judgment
16 where informed judgment includes understanding of a company's plans for retirement
17 of the assets, current practices, current estimates and an understanding of the industry
18 practices. A complete understanding of the retirement transactions shows negative
19 net salvage more negative than 10 percent from 1984 through 1995. Also, there is
20 consistent negative net salvage from 2011 through 2019. These two periods have ages
21 of main retirements that were consistent with what is expected to occur into the future
22 so there should be emphasis on these periods for determining the future net salvage
23 percentage. Additionally, the unusually high gross salvage activity for the period 1997

1 through 2010 was the result of a process the Company was utilizing during the period
2 where assets once in service were being returned to inventory for reuse in the future
3 and their value was being recorded as gross salvage. Given the assets were being
4 returned to inventory for future use, it appears no cost of removal was being recorded
5 related to their removal. The returned assets to inventory were halted in 2011 when it
6 was determined the mains could not be reused. The net salvage percentage for almost
7 all other gas companies' distribution mains is more negative than negative 10%, which
8 the Company recommends in this case. Consequently, the negative 10% estimate is
9 the most appropriate level anticipated in the future.

10 Next, I will discuss the net salvage estimate proposed for Account 381.00
11 (Meters). The net salvage activity related to assets recorded in Account 381 (Meters)
12 is also 1984 through 2019. This account has consistently recorded zero cost of
13 removal and modest amounts of gross salvage. Again, considering all the key factors
14 such as the current market for retired meters and the most recent five year levels, the
15 positive 2% recommended in the Depreciation Study is the most appropriate into the
16 future.

C. REALLOCATION OF NEGATIVE ACCUMULATED RESERVE

17 **Q. HAS STAFF REALLOCATED THE NEGATIVE ACCUMULATED
18 RESERVE RELATED TO ACCOUNTS 305.00 (STRUCTURES AND
19 IMPROVEMENTS), 311.00 (LIQUEFIED PETROLEUM GAS EQUIPMENT)
20 AND 387.00 (OTHER EQUIPMENT) AS OF DECEMBER 31, 2019?**

21 A. Yes. Lines 22 through 24 on page 31 of Staff's direct cost of service report state: "To
22 offset these negative balances, adjustments have been made to Accounts 374

(Distribution Plant – Land & Land Rights), 376 (Distribution Plant – Gas Mains), and 380 (Services).”

Q. DO YOU AGREE THAT STAFF MADE ADJUSTMENTS TO THE ACCOUNTS PROVIDED IN THE RESPONSE TO THE PRIOR QUESTION TO OFFSET THE NEGATIVE ACCUMULATED RESERVE ACCOCIATED WITH ACCOUNTS 305.00 (STRUCTURES AND IMPROVEMENTS), 311.00 (LIQUEFIED PETROLEUM GAS EQUIPMENT) AND 387.00 (OTHER EQUIPMENT)?

A. No. Although Staff does seem to make reserve adjustments in its Accumulated Depreciation Reserve True-Up as of September 30, 2021 in the fashion stated at lines 22 through 24 on page 31 of their report, Staff provided a number of workpaper files that supported the development of the depreciation rates it presented in their Direct Accounting Schedules. In the workpaper file Staff presented as "DEPRATE1.PRN" (which is its calculation of depreciation rates as of December 31, 2019), it would appear Staff offset the negative accumulated reserve as of December 31, 2019 associated with Account 305.00 (Structures and Improvements) to Account 375.00 (Structures and Improvements), Account 311.00 (Liquefied Petroleum Gas Equipment) to Account 376.00 (Gas Mains), and Account 387.00 (Other Equipment) to Account 378.00 (Measuring and Regulating Station Equipment – General).

**Q. ARE YOU OPPOSED TO HOW STAFF REALLOCATED THE NEGATIVE
ACCUMULATED RESERVE ASSOCIATED WITH ACCOUNTS 305.00
(STRUCTURES AND IMPROVEMENTS), 311.00 (LIQUEFIED
PETROLEUM GAS EQUIPMENT) AND 387.00 (OTHER EQUIPMENT) AS**

1 **IT RELATED TO THE CALCULATION OF DEPREIICATION ACCRUAL**
2 **RATES AS OF DEEMBER 31, 2019?**

3 A. No. The calculation of the Company's proposed depreciation accrual rates as of
4 December 31, 2019 were calculated using the same reallocation process as was
5 utilized by Staff in the calculation of its depreciation accrual rates as of December 31,
6 2019. However, it would be appropriate to maintain the same reallocation amounts
7 when providing results for the updated test year. This has not been done, so the results
8 are not consistently calculated.

9 **III. AMI GAS MODULES**

10 **Q. IS AMEREN MISSOURI PLANNING TO BEGIN A SMART METER**
11 **PROGRAM THAT INCLUDES AMI GAS MODULES**

12 A. Yes. Ameren Missouri plans to retrofit the gas meters with an AMI gas module during
13 2023 and 2024.

14 **Q. WILL THE AMI GAS MODULES HAVE THE SAME LIFE AS THE**
15 **EXISTING GAS METERS?**

16 A. No. The gas modules will have a shorter life.

17 **Q. WHAT WOULD BE THE PROPER LIFE AND RATE FOR THE NEW AMI**
18 **GAS MODULES?**

19 A. The AMI gas modules should be their own property unit and classified separately in a
20 subaccount of gas meters. The AMI gas module should have an average life of 15
21 years and depreciation rate of 6.67%.

22 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

23 A. Yes.

Schedule JJS-R1

JOHN SPANOS
DEPRECIATION EXPERIENCE

Q. Please state your name.

A. My name is John J. Spanos.

Q. What is your educational background?

A. I have Bachelor of Science degrees in Industrial Management and Mathematics from Carnegie-Mellon University and a Master of Business Administration from York College.

Q. Do you belong to any professional societies?

A. Yes. I am a member and past President of the Society of Depreciation Professionals and a member of the American Gas Association/Edison Electric Institute Industry Accounting Committee.

Q. Do you hold any special certification as a depreciation expert?

A. Yes. The Society of Depreciation Professionals has established national standards for depreciation professionals. The Society administers an examination to become certified in this field. I passed the certification exam in September 1997 and was recertified in August 2003, February 2008, January 2013 and February 2018.

Q. Please outline your experience in the field of depreciation.

A. In June 1986, I was employed by Gannett Fleming Valuation and Rate Consultants, Inc. as a Depreciation Analyst. During the period from June 1986 through December 1995, I helped prepare numerous depreciation and original cost studies for utility companies in various industries. I helped perform depreciation studies for the following telephone companies: United Telephone of Pennsylvania, United Telephone of New Jersey, and Anchorage Telephone Utility. I helped perform depreciation studies for the following

companies in the railroad industry: Union Pacific Railroad, Burlington Northern Railroad, and Wisconsin Central Transportation Corporation.

I helped perform depreciation studies for the following organizations in the electric utility industry: Chugach Electric Association, The Cincinnati Gas and Electric Company (CG&E), The Union Light, Heat and Power Company (ULH&P), Northwest Territories Power Corporation, and the City of Calgary - Electric System.

I helped perform depreciation studies for the following pipeline companies: TransCanada Pipelines Limited, Trans Mountain Pipe Line Company Ltd., Interprovincial Pipe Line Inc., Nova Gas Transmission Limited and Lakehead Pipeline Company.

I helped perform depreciation studies for the following gas utility companies: Columbia Gas of Pennsylvania, Columbia Gas of Maryland, The Peoples Natural Gas Company, T. W. Phillips Gas & Oil Company, CG&E, ULH&P, Lawrenceburg Gas Company and Penn Fuel Gas, Inc.

I helped perform depreciation studies for the following water utility companies: Indiana-American Water Company, Consumers Pennsylvania Water Company and The York Water Company; and depreciation and original cost studies for Philadelphia Suburban Water Company and Pennsylvania-American Water Company.

In each of the above studies, I assembled and analyzed historical and simulated data, performed field reviews, developed preliminary estimates of service life and net salvage, calculated annual depreciation, and prepared reports for submission to state public utility commissions or federal regulatory agencies. I performed these studies under the general direction of William M. Stout, P.E.

In January 1996, I was assigned to the position of Supervisor of Depreciation Studies. In July 1999, I was promoted to the position of Manager, Depreciation and

Valuation Studies. In December 2000, I was promoted to the position as Vice-President of Gannett Fleming Valuation and Rate Consultants, Inc., in April 2012, I was promoted to the position as Senior Vice President of the Valuation and Rate Division of Gannett Fleming Inc. (now doing business as Gannett Fleming Valuation and Rate Consultants, LLC) and in January of 2019, I was promoted to my present position of President of Gannett Fleming Valuation and Rate Consultants, LLC. In my current position I am responsible for conducting all depreciation, valuation and original cost studies, including the preparation of final exhibits and responses to data requests for submission to the appropriate regulatory bodies.

Since January 1996, I have conducted depreciation studies similar to those previously listed including assignments for Pennsylvania-American Water Company; Aqua Pennsylvania; Kentucky-American Water Company; Virginia-American Water Company; Indiana-American Water Company; Iowa-American Water Company; New Jersey-American Water Company; Hampton Water Works Company; Omaha Public Power District; Enbridge Pipe Line Company; Inc.; Columbia Gas of Virginia, Inc.; Virginia Natural Gas Company National Fuel Gas Distribution Corporation - New York and Pennsylvania Divisions; The City of Bethlehem - Bureau of Water; The City of Coatesville Authority; The City of Lancaster - Bureau of Water; Peoples Energy Corporation; The York Water Company; Public Service Company of Colorado; Enbridge Pipelines; Enbridge Gas Distribution, Inc.; Reliant Energy-HLP; Massachusetts-American Water Company; St. Louis County Water Company; Missouri-American Water Company; Chugach Electric Association; Alliant Energy; Oklahoma Gas & Electric Company; Nevada Power Company; Dominion Virginia Power; NUI-Virginia Gas Companies; Pacific Gas & Electric Company; PSI Energy; NUI - Elizabethtown Gas Company; Cinergy Corporation – CG&E; Cinergy Corporation – ULH&P; Columbia Gas of Kentucky; South Carolina Electric & Gas Company; Idaho Power Company; El Paso

Electric Company; Aqua North Carolina; Aqua Ohio; Aqua Texas, Inc.; Aqua Illinois, Inc.; Ameren Missouri; Central Hudson Gas & Electric; Centennial Pipeline Company; CenterPoint Energy-Arkansas; CenterPoint Energy – Oklahoma; CenterPoint Energy – Entex; CenterPoint Energy - Louisiana; NSTAR – Boston Edison Company; Westar Energy, Inc.; United Water Pennsylvania; PPL Electric Utilities; PPL Gas Utilities; Wisconsin Power & Light Company; TransAlaska Pipeline; Avista Corporation; Northwest Natural Gas; Allegheny Energy Supply, Inc.; Public Service Company of North Carolina; South Jersey Gas Company; Duquesne Light Company; MidAmerican Energy Company; Laclede Gas; Duke Energy Company; E.ON U.S. Services Inc.; Elkton Gas Services; Anchorage Water and Wastewater Utility; Kansas City Power and Light; Duke Energy North Carolina; Duke Energy South Carolina; Monongahela Power Company; Potomac Edison Company; Duke Energy Ohio Gas; Duke Energy Kentucky; Duke Energy Indiana; Duke Energy Progress; Northern Indiana Public Service Company; Tennessee-American Water Company; Columbia Gas of Maryland; Maryland-American Water Company; Bonneville Power Administration; NSTAR Electric and Gas Company; EPCOR Distribution, Inc.; B. C. Gas Utility, Ltd; Entergy Arkansas; Entergy Texas; Entergy Mississippi; Entergy Louisiana; Entergy Gulf States Louisiana; the Borough of Hanover; Louisville Gas and Electric Company; Kentucky Utilities Company; Madison Gas and Electric; Central Maine Power; PEPCO; PacifiCorp; Minnesota Energy Resource Group; Jersey Central Power & Light Company; Cheyenne Light, Fuel and Power Company; United Water Arkansas; Central Vermont Public Service Corporation; Green Mountain Power; Portland General Electric Company; Atlantic City Electric; Nicor Gas Company; Black Hills Power; Black Hills Colorado Gas; Black Hills Kansas Gas; Black Hills Service Company; Black Hills Utility Holdings; Public Service Company of Oklahoma; City of

Dubois; Peoples Gas Light and Coke Company; North Shore Gas Company; Connecticut Light and Power; New York State Electric and Gas Corporation; Rochester Gas and Electric Corporation; Greater Missouri Operations; Tennessee Valley Authority; Omaha Public Power District; Indianapolis Power & Light Company; Vermont Gas Systems, Inc.; Metropolitan Edison; Pennsylvania Electric; West Penn Power; Pennsylvania Power; PHI Service Company - Delmarva Power and Light; Atmos Energy Corporation; Citizens Energy Group; PSE&G Company; Berkshire Gas Company; Alabama Gas Corporation; Mid-Atlantic Interstate Transmission, LLC; SUEZ Water; WEC Energy Group; Rocky Mountain Natural Gas, LLC; Illinois-American Water Company; Northern Illinois Gas Company; Public Service of New Hampshire and Newtown Artesian Water Company.

My additional duties include determining final life and salvage estimates, conducting field reviews, presenting recommended depreciation rates to management for its consideration and supporting such rates before regulatory bodies.

Q. Have you submitted testimony to any state utility commission on the subject of utility plant depreciation?

- A. Yes. I have submitted testimony to the Pennsylvania Public Utility Commission; the Commonwealth of Kentucky Public Service Commission; the Public Utilities Commission of Ohio; the Nevada Public Utility Commission; the Public Utilities Board of New Jersey; the Missouri Public Service Commission; the Massachusetts Department of Telecommunications and Energy; the Alberta Energy & Utility Board; the Idaho Public Utility Commission; the Louisiana Public Service Commission; the State Corporation Commission of Kansas; the Oklahoma Corporate Commission; the Public Service Commission of South Carolina; Railroad Commission of Texas – Gas Services Division; the New York Public Service Commission; Illinois Commerce Commission; the Indiana

Utility Regulatory Commission; the California Public Utilities Commission; the Federal Energy Regulatory Commission (“FERC”); the Arkansas Public Service Commission; the Public Utility Commission of Texas; Maryland Public Service Commission; Washington Utilities and Transportation Commission; The Tennessee Regulatory Commission; the Regulatory Commission of Alaska; Minnesota Public Utility Commission; Utah Public Service Commission; District of Columbia Public Service Commission; the Mississippi Public Service Commission; Delaware Public Service Commission; Virginia State Corporation Commission; Colorado Public Utility Commission; Oregon Public Utility Commission; South Dakota Public Utilities Commission; Wisconsin Public Service Commission; Wyoming Public Service Commission; the Public Service Commission of West Virginia; Maine Public Utility Commission; Iowa Utility Board; Connecticut Public Utilities Regulatory Authority; New Mexico Public Regulation Commission; Commonwealth of Massachusetts Department of Public Utilities; Rhode Island Public Utilities Commission and the North Carolina Utilities Commission.

Q. Have you had any additional education relating to utility plant depreciation?

- A. Yes. I have completed the following courses conducted by Depreciation Programs, Inc.: “Techniques of Life Analysis,” “Techniques of Salvage and Depreciation Analysis,” “Forecasting Life and Salvage,” “Modeling and Life Analysis Using Simulation,” and “Managing a Depreciation Study.” I have also completed the “Introduction to Public Utility Accounting” program conducted by the American Gas Association.

Q. Does this conclude your qualification statement?

- A. Yes.

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY

<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
01. 1998	PA PUC	R-00984375	City of Bethlehem – Bureau of Water	Original Cost and Depreciation
02. 1998	PA PUC	R-00984567	City of Lancaster	Original Cost and Depreciation
03. 1999	PA PUC	R-00994605	The York Water Company	Depreciation
04. 2000	D.T.&E.	DTE 00-105	Massachusetts-American Water Company	Depreciation
05. 2001	PA PUC	R-00016114	City of Lancaster	Original Cost and Depreciation
06. 2001	PA PUC	R-00017236	The York Water Company	Depreciation
07. 2001	PA PUC	R-00016339	Pennsylvania-American Water Company	Depreciation
08. 2001	OH PUC	01-1228-GA-AIR	Cinergy Corp – Cincinnati Gas & Elect Company	Depreciation
09. 2001	KY PSC	2001-092	Cinergy Corp – Union Light, Heat & Power Co.	Depreciation
10. 2002	PA PUC	R-00016750	Philadelphia Suburban Water Company	Depreciation
11. 2002	KY PSC	2002-00145	Columbia Gas of Kentucky	Depreciation
12. 2002	NJ BPU	GF02040245	NUI Corporation/Elizabethtown Gas Company	Depreciation
13. 2002	ID PUC	IPC-E-03-7	Idaho Power Company	Depreciation
14. 2003	PA PUC	R-0027975	The York Water Company	Depreciation
15. 2003	IN URC	R-0027975	Cinergy Corp – PSI Energy, Inc.	Depreciation
16. 2003	PA PUC	R-00038304	Pennsylvania-American Water Company	Depreciation
17. 2003	MO PSC	WR-2003-0500	Missouri-American Water Company	Depreciation
18. 2003	FERC	ER03-1274-000	NSTAR-Boston Edison Company	Depreciation
19. 2003	NJ BPU	BPU 03080683	South Jersey Gas Company	Depreciation
20. 2003	NV PUC	03-10001	Nevada Power Company	Depreciation
21. 2003	LA PSC	U-27676	CenterPoint Energy – Arkla	Depreciation
22. 2003	PA PUC	R-00038805	Pennsylvania Suburban Water Company	Depreciation
23. 2004	AB En/Util Bd	1306821	EPCOR Distribution, Inc.	Depreciation
24. 2004	PA PUC	R-00038168	National Fuel Gas Distribution Corp (PA)	Depreciation
25. 2004	PA PUC	R-00049255	PPL Electric Utilities	Depreciation
26. 2004	PA PUC	R-00049165	The York Water Company	Depreciation
27. 2004	OK Corp Cm	PUC 200400187	CenterPoint Energy – Arkla	Depreciation
28. 2004	OH PUC	04-680-EI-AIR	Cinergy Corp. – Cincinnati Gas and Electric Company	Depreciation
29. 2004	RR Com of TX	GUD#	CenterPoint Energy – Entex Gas Services Div.	Depreciation
30. 2004	NY PUC	04-G-1047	National Fuel Gas Distribution Gas (NY)	Depreciation
31. 2004	AR PSC	04-121-U	CenterPoint Energy – Arkla	Depreciation
32. 2005	IL CC	05-ICC-06	North Shore Gas Company	Depreciation
33. 2005	IL CC	05-ICC-06	Peoples Gas Light and Coke Company	Depreciation
34. 2005	KY PSC	2005-00042	Union Light Heat & Power	Depreciation

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<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
35.	2005	IL CC	05-0308	Depreciation
36.	2005	MO PSC	GF-2005	Depreciation
37.	2005	KS CC	05-WSEE-981-RTS	Depreciation
38.	2005	RR Com of TX	GUD #	Depreciation
39.	2005	US District Court	Cause No. 1:99-CV-1693-LJM/VSS	Accounting
40.	2005	OK CC	PUD 200500151	Depreciation
41.	2005	MA Dept Tele-com & Ergy	DTE 05-85	Depreciation
42.	2005	NY PUC	05-E-934/05-G-0935	Depreciation
43.	2005	AK Reg Com	U-04-102	Depreciation
44.	2005	CA PUC	A05-12-002	Depreciation
45.	2006	PA PUC	R-00051030	Depreciation
46.	2006	PA PUC	R-00051178	Depreciation
47.	2006	NC Util Cm.	G-5, Sub522	Depreciation
48.	2006	PA PUC	R-00051167	Depreciation
49.	2006	PA PUC	R00061346	Depreciation
50.	2006	PA PUC	R-00061322	Depreciation
51.	2006	PA PUC	R-00051298	Depreciation
52.	2006	PUC of TX	32093	Depreciation
53.	2006	KY PSC	2006-00172	Depreciation
54.	2006	SC PSC		Accounting
55.	2006	AK Reg Com	U-06-6	Depreciation
56.	2006	DE PSC	06-284	Depreciation
57.	2006	IN URC	IURC43081	Depreciation
58.	2006	AK Reg Com	U-06-134	Depreciation
59.	2006	MO PSC	WR-2007-0216	Depreciation
60.	2006	FERC	IS05-82-002, et al	Depreciation
61.	2006	PA PUC	R-00061493	Depreciation
62.	2007	NC Util Com.	E-7 SUB 828	Depreciation
63.	2007	OH PSC	08-709-EL-AIR	Depreciation
64.	2007	PA PUC	R-00072155	Depreciation
65.	2007	KY PSC	2007-00143	Depreciation

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<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>	
66.	2007	PA PUC	R-00072229	Pennsylvania American Water Company	Depreciation
67.	2007	KY PSC	2007-0008	NiSource – Columbia Gas of Kentucky	Depreciation
68.	2007	NY PSC	07-G-0141	National Fuel Gas Distribution Corp (NY)	Depreciation
69.	2008	AK PSC	U-08-004	Anchorage Water & Wastewater Utility	Depreciation
70.	2008	TN Reg Auth	08-00039	Tennessee-American Water Company	Depreciation
71.	2008	DE PSC	08-96	Artesian Water Company	Depreciation
72.	2008	PA PUC	R-2008-2023067	The York Water Company	Depreciation
73.	2008	KS CC	08-WSEE1-RTS	Westar Energy	Depreciation
74.	2008	IN URC	43526	Northern Indiana Public Service Company	Depreciation
75.	2008	IN URC	43501	Duke Energy Indiana	Depreciation
76.	2008	MD PSC	9159	NiSource – Columbia Gas of Maryland	Depreciation
77.	2008	KY PSC	2008-000251	Kentucky Utilities	Depreciation
78.	2008	KY PSC	2008-000252	Louisville Gas & Electric	Depreciation
79.	2008	PA PUC	2008-20322689	Pennsylvania American Water Co. - Wastewater	Depreciation
80.	2008	NY PSC	08-E887/08-00888	Central Hudson	Depreciation
81.	2008	WV TC	VE-080416/VG-8080417	Avista Corporation	Depreciation
82.	2008	IL CC	ICC-09-166	Peoples Gas, Light and Coke Company	Depreciation
83.	2009	IL CC	ICC-09-167	North Shore Gas Company	Depreciation
84.	2009	DC PSC	1076	Potomac Electric Power Company	Depreciation
85.	2009	KY PSC	2009-00141	NiSource – Columbia Gas of Kentucky	Depreciation
86.	2009	FERC	ER08-1056-002	Entergy Services	Depreciation
87.	2009	PA PUC	R-2009-2097323	Pennsylvania American Water Company	Depreciation
88.	2009	NC Util Cm	E-7, Sub 090	Duke Energy Carolinas, LLC	Depreciation
89.	2009	KY PSC	2009-00202	Duke Energy Kentucky	Depreciation
90.	2009	VA St. CC	PUE-2009-00059	Aqua Virginia, Inc.	Depreciation
91.	2009	PA PUC	2009-2132019	Aqua Pennsylvania, Inc.	Depreciation
92.	2009	MS PSC	Docket No. 2011-UA-183	Entergy Mississippi	Depreciation
93.	2009	AK PSC	09-08-U	Entergy Arkansas	Depreciation
94.	2009	TX PUC	37744	Entergy Texas	Depreciation
95.	2009	TX PUC	37690	El Paso Electric Company	Depreciation
96.	2009	PA PUC	R-2009-2106908	The Borough of Hanover	Depreciation
97.	2009	KS CC	10-KCPE-415-RTS	Kansas City Power & Light	Depreciation
98.	2009	PA PUC	R-2009-	United Water Pennsylvania	Depreciation

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<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
99.	2009	OH PUC	Aqua Ohio Water Company	Depreciation
100.	2009	WI PSC	Madison Gas & Electric Company	Depreciation
101.	2009	MO PSC	Missouri American Water Company	Depreciation
102.	2009	AK Reg Cm	Chugach Electric Association	Depreciation
103.	2010	IN URC	Northern Indiana Public Service Company	Depreciation
104.	2010	WI PSC	Wisconsin Public Service Corp.	Depreciation
105.	2010	PA PUC	PPL Electric Utilities Corp.	Depreciation
106.	2010	KY PSC	Kentucky American Water Company	Depreciation
107.	2010	PA PUC	Columbia Gas of Pennsylvania	Depreciation
108.	2010	MO PSC	Laclede Gas Company	Depreciation
109.	2010	SC PSC	South Carolina Electric & Gas Company	Depreciation
110.	2010	NJ BD OF PU	Atlantic City Electric	Depreciation
111.	2010	VA St. CC	Virginia American Water Company	Depreciation
112.	2010	PA PUC	The York Water Company	Depreciation
113.	2010	MO PSC	Greater Missouri Operations Company	Depreciation
114.	2010	MO PSC	Kansas City Power and Light	Depreciation
115.	2010	PA PUC	T.W. Phillips Gas and Oil Company	Depreciation
116.	2010	PSC SC	SCANA – Electric	Depreciation
117.	2010	PA PUC	Peoples Natural Gas, LLC	Depreciation
118.	2010	AK PSC	Oklahoma Gas and Electric Company	Depreciation
119.	2010	IN URC	Northern Indiana Public Serv. Company - NIFL	Depreciation
120.	2010	IN URC	Northern Indiana Public Serv. Co. - Kokomo	Depreciation
121.	2010	PA PUC	Pennsylvania American Water Co. - WW	Depreciation
122.	2010	NC Util Cn.	Aqua North Carolina, Inc.	Depreciation
123.	2011	OH PUC	Ohio American Water Company	Depreciation
124.	2011	MS PSC	Entergy Mississippi	Depreciation
125.	2011	CO PUC	Black Hills Colorado	Depreciation
126.	2011	PA PUC	Columbia Gas of Pennsylvania	Depreciation
127.	2011	PA PUC	City of Lancaster – Bureau of Water	Depreciation
128.	2011	IN URC	Duke Energy Indiana	Depreciation
129.	2011	FERC	Enbridge Pipelines (Southern Lights)	Depreciation
130.	2011	IL CC	MidAmerican Energy Corporation	Depreciation
131.	2011	OK CC	Oklahoma Gas & Electric Company	Depreciation
132.	2011	PA PUC	Pennsylvania American Water Company	Depreciation

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<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
133.	2011	FERC	RP11-__-000	Depreciation
134.	2012	WA UTC	UE-120436/UG-120437	Depreciation
135.	2012	AK Reg Cm	U-12-009	Depreciation
136.	2012	MA PUC	DPU 12-25	Depreciation
137.	2012	TX PUC	40094	Depreciation
138.	2012	ID PUC	IPC-E-12	Depreciation
139.	2012	PA PUC	R-2012-2290597	Depreciation
140.	2012	PA PUC	R-2012-2311725	Depreciation
141.	2012	KY PSC	2012-00222	Depreciation
142.	2012	KY PSC	2012-00221	Depreciation
143.	2012	PA PUC	R-2012-2285985	Depreciation
144.	2012	DC PSC	Case 1087	Depreciation
145.	2012	OH PSC	12-1682-EL-AIR	Depreciation
146.	2012	OH PSC	12-1685-GA-AIR	Depreciation
147.	2012	PA PUC	R-2012-2310366	Depreciation
148.	2012	PA PUC	R-2012-2321748	Depreciation
149.	2012	FERC	ER-12-2681-000	Depreciation
150.	2012	MO PSC	ER-2012-0174	Depreciation
151.	2012	MO PSC	ER-2012-0175	Depreciation
152.	2012	MO PSC	GO-2012-0363	Depreciation
153.	2012	MN PUC	G007,001/D-12-533	Depreciation
154.	2012	TX PUC	SOAH 582-14-1051/ TECQ 2013-2007-UCR	Depreciation
155.	2012	PA PUC	2012-2336379	Depreciation
156.	2013	NJ BPU	ER12121071	Depreciation
157.	2013	KY PSC	2013-00167	Depreciation
158.	2013	VA St CC	2013-00020	Depreciation
159.	2013	IA Util Bd	2013-0004	Depreciation
160.	2013	PA PUC	2013-2355276	Depreciation
161.	2013	NY PSC	13-E-0030, 13-G-0031, 13-S-0032	Depreciation
162.	2013	PA PUC	2013-2355886	Depreciation
163.	2013	TN Reg Auth	12-0504	Depreciation
164.	2013	ME PUC	2013-168	Depreciation
165.	2013	DC PSC	Case 1103	Depreciation

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<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
166.	2013	WY PSC	2003-ER-13	Cheyenne Light, Fuel and Power Company
167.	2013	FERC	ER13-2428-0000	Kentucky Utilities
168.	2013	FERC	ER13- -0000	MidAmerican Energy Company
169.	2013	FERC	ER13-2410-0000	PPL Utilities
170.	2013	PA PUC	R-2013-2372129	Duquesne Light Company
171.	2013	NJ BPU	ER12111052	Jersey Central Power and Light Company
172.	2013	PA PUC	R-2013-2390244	Bethlehem, City of – Bureau of Water
173.	2013	OK CC	UM 1679	Oklahoma, Public Service Company of
174.	2013	IL CC	13-0500	Nicor Gas Company
175.	2013	WY PSC	20000-427-EA-13	PacifiCorp
176.	2013	UT PSC	13-035-02	PacifiCorp
177.	2013	OR PUC	UM 1647	PacifiCorp
178.	2013	PA PUC	2013-2350509	Dubois, City of
179.	2014	IL CC	14-0224	North Shore Gas Company
180.	2014	FERC	ER14- -0000	Duquesne Light Company
181.	2014	SD PUC	EL14-026	Black Hills Power Company
182.	2014	WY PSC	20002-91-ER-14	Black Hills Power Company
183.	2014	PA PUC	2014-2428304	Borough of Hanover – Municipal Water Works
184.	2014	PA PUC	2014-2406274	Columbia Gas of Pennsylvania
185.	2014	IL CC	14-0225	Peoples Gas Light and Coke Company
186.	2014	MO PSC	ER-2014-0258	Ameren Missouri
187.	2014	KS CC	14-BHCG-502-RTS	Black Hills Service Company
188.	2014	KS CC	14-BHCG-502-RTS	Black Hills Utility Holdings
189.	2014	KS CC	14-BHCG-502-RTS	Black Hills Kansas Gas
190.	2014	PA PUC	2014-2418872	Lancaster, City of – Bureau of Water
191.	2014	WV PSC	14-0701-E-D	First Energy – MonPower/PotomacEdison
192.	2014	VA St CC	PUC-2014-00045	Aqua Virginia
193.	2014	VA St CC	PUE-2013	Virginia American Water Company
194.	2014	OK CC	PUD201400229	Oklahoma Gas and Electric Company
195.	2014	OR PUC	UM1679	Portland General Electric
196.	2014	IN URC	Cause No. 44576	Indianapolis Power & Light
197.	2014	MA DPU	DPU. 14-150	NSTAR Gas
198.	2014	CT PURA	14-05-06	Connecticut Light and Power
199.	2014	MO PSC	ER-2014-0370	Kansas City Power & Light

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200.	2014	KY PSC	2014-00371	Kentucky Utilities Company Depreciation
201.	2014	KY PSC	2014-00372	Louisville Gas and Electric Company Depreciation
202.	2015	PA PUC	R-2015-2462723	United Water Pennsylvania Inc. Depreciation
203.	2015	PA PUC	R-2015-2468056	NiSource - Columbia Gas of Pennsylvania Depreciation
204.	2015	NY PSC	15-E-0283/15-G-0284	New York State Electric and Gas Corporation Depreciation
205.	2015	NY PSC	15-E-0285/15-G-0286	Rochester Gas and Electric Corporation Depreciation
206.	2015	MO PSC	WR-2015-0301/SR-2015-0302	Missouri American Water Company Depreciation
207.	2015	OK CC	PUD 201500208	Oklahoma, Public Service Company of Depreciation
208.	2015	WV PSC	15-0676-W-42T	West Virginia American Water Company Depreciation
209.	2015	PA PUC	2015-2469275	PPL Electric Utilities Depreciation
210.	2015	IN URC	Cause No. 44688	Northern Indiana Public Service Company Depreciation
211.	2015	OH PSC	14-1929-EL-RDR	First Energy-Ohio Edison/Cleveland Electric/ Toledo Edison Depreciation
212.	2015	NM PRC	15-00127-UT	El Paso Electric Depreciation
213.	2015	TX PUC	PUC-44941; SOAH 473-15-5257	El Paso Electric Depreciation
214.	2015	WI PSC	3270-DU-104	Madison Gas and Electric Company Depreciation
215.	2015	OK CC	PUD 201500273	Oklahoma Gas and Electric Depreciation
216.	2015	KY PSC	Doc. No. 2015-00418	Kentucky American Water Company Depreciation
217.	2015	NC UC	Doc. No. G-5, Sub 565	Public Service Company of North Carolina Depreciation
218.	2016	WA UTC	Docket UE-17	Puget Sound Energy Depreciation
219.	2016	NY PSC	Case No. 16-W-0130	SUEZ Water New York, Inc. Depreciation
220.	2016	MO PSC	ER-2016-0156	KCPL – Greater Missouri Depreciation
221.	2016	WI PSC		Wisconsin Public Service Corporation Depreciation
222.	2016	KY PSC	Case No. 2016-00026	Kentucky Utilities Company Depreciation
223.	2016	KY PSC	Case No. 2016-00027	Louisville Gas and Electric Company Depreciation
224.	2016	OH PUC	Case No. 16-0907-WW-AIR	Aqua Ohio Depreciation
225.	2016	MD PSC	Case 9417	NiSource - Columbia Gas of Maryland Depreciation
226.	2016	KY PSC	2016-00162	Columbia Gas of Kentucky Depreciation
227.	2016	DE PSC	16-0649	Delmarva Power and Light Company – Electric Depreciation
228.	2016	DE PSC	16-0650	Delmarva Power and Light Company – Gas Depreciation
229.	2016	NY PSC	Case 16-G-0257	National Fuel Gas Distribution Corp – NY Div Depreciation
230.	2016	PA PUC	R-2016-2537349	Metropolitan Edison Company Depreciation
231.	2016	PA PUC	R-2016-2537352	Pennsylvania Electric Company Depreciation
232.	2016	PA PUC	R-2016-2537355	Pennsylvania Power Company Depreciation

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233.	2016	PA PUC	R-2016-2537359	Depreciation
234.	2016	PA PUC	R-2016-2529660	Depreciation
235.	2016	KY PSC	Case No. 2016-00063	Depreciation
236.	2016	MO PSC	ER-2016-0285	Depreciation
237.	2016	AR PSC	16-052-U	Depreciation
238.	2016	PSCW	6680-DU-104	Depreciation
239.	2016	ID PUC	IPC-E-16-23	Depreciation
240.	2016	OR PUC	UM1801	Depreciation
241.	2016	ILL CC	16-	Depreciation
242.	2016	KY PSC	Case No. 2016-00370	Depreciation
243.	2016	KY PSC	Case No. 2016-00371	Depreciation
244.	2016	IN URC	Cause No. 45029	Depreciation
245.	2016	AL RC	U-16-081	Depreciation
246.	2017	MA DPU	D.P.U. 17-05	Depreciation
247.	2017	TX PUC	PUC-26831, SOAH 973-17-2686	Depreciation
248.	2017	WA UTC	UE-17033 and UG-170034	Depreciation
249.	2017	OH PUC	Case No. 17-0032-EL-AIR	Depreciation
250.	2017	VA SCC	Case No. PUE-2016-00413	Depreciation
251.	2017	OK CC	Case No. PUD201700151	Depreciation
252.	2017	MD PSC	Case No. 9447	Depreciation
253.	2017	NC UC	Docket No. E-2, Sub 1142	Depreciation
254.	2017	VA SCC	Case No. PUR-2017-00090	Depreciation
255.	2017	FERC	ER17-1162	Depreciation
256.	2017	PA PUC	R-2017-2595853	Depreciation
257.	2017	OR PUC	UM1809	Depreciation
258.	2017	FERC	ER17-217-000	Depreciation
259.	2017	FERC	ER17-211-000	Depreciation
260.	2017	MN PUC	Docket No. G007/D-17-442	Depreciation
261.	2017	IL CC	Docket No. 17-0124	Depreciation
262.	2017	OR PUC	UM1808	Depreciation
263.	2017	NY PSC	Case No. 17-W-0528	Depreciation
264.	2017	MO PSC	GR-2017-0215	Depreciation
265.	2017	MO PSC	GR-2017-0216	Depreciation

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266.	2017	ILL CC	Docket No. 17-0337	Depreciation
267.	2017	FERC	Docket No. ER18-22-000	Depreciation
268.	2017	IN URC	Cause No. 44988	Depreciation
269.	2017	NJ BPU	BPU Docket No. WR17090985	Depreciation
270.	2017	RI PUC	Docket No. 4800	Depreciation
271.	2017	OK CC	Cause No. PUD 201700496	Depreciation
272.	2017	NJ BPU	ER18010029 & GR18010030	Depreciation
273.	2017	NC Util Com.	Docket No. E-7, SUB 1146	Depreciation
274.	2017	KY PSC	Case No. 2017-00321	Depreciation
275.	2017	MA DPU	D.P.U. 18-40	Depreciation
276.	2018	IN IURC	Cause No. 44992	Depreciation
277.	2018	IN IURC	Cause No. 45029	Depreciation
278.	2018	NC Util Com.	Docket No. W-218, Sub 497	Depreciation
279.	2018	PA PUC	Docket No. R-2018-2647577	Depreciation
280.	2018	OR PUC	Docket UM 1933	Depreciation
281.	2018	WA UTC	Docket No. UE-108167	Depreciation
282.	2018	ID PUC	AVU-E-18-03, AVU-G-18-02	Depreciation
283.	2018	IN URC	Cause No. 45039	Depreciation
284.	2018	FERC	Docket No. ER18-	Depreciation
285.	2018	PA PUC	Docket No. R-2018-3000124	Depreciation
286.	2018	MD PSC	Case No. 948	Depreciation
287.	2018	MA DPU	D.P.U. 18-45	Depreciation
288.	2018	OH PUC	Case No. 18-0299-GA-ALT	Depreciation
289.	2018	PA PUC	Docket No. R-2018-3000834	Depreciation
290.	2018	MD PSC	Case No. 9847	Depreciation
291.	2018	PA PUC	Docket No. R-2018-3000019	Depreciation
292.	2018	FERC	ER-18-2231-000	Depreciation
293.	2018	KY PSC	Case No. 2018-00261	Depreciation
294.	2018	NJ BPU	BPU Docket No. WR18050593	Depreciation
295.	2018	WA UTC	Docket No. UE-180778	Depreciation
296.	2018	UT PSC	Docket No. 18-035-36	Depreciation
297.	2018	OR PUC	Docket No. UM-1968	Depreciation
298.	2018	ID PUC	Case No. PAC-E-18-08	Depreciation
299.	2018	WY PSC	20000-539-EA-18	Depreciation
300.	2018	PA PUC	Docket No. R-2018-3003068	Depreciation
			Aqua Pennsylvania, Inc.	

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301.	2018	IL CC	Docket No. 18-1467	Aqua Illinois, Inc.	Depreciation
302.	2018	KY PSC	Case No. 2018-00294	Louisville Gas & Electric Company	Depreciation
303.	2018	KY PSC	Case No. 2018-00295	Kentucky Utilities Company	Depreciation
304.	2018	IN URC	Cause No. 45159	Northern Indiana Public Service Company	Depreciation
305.	2018	VA SCC	Case No. PUR-2019-00175	Virginia American Water Company	Depreciation
306.	2019	PA PUC	Docket No. R-2018-3006818	Peoples Natural Gas Company, LLC	Depreciation
307.	2019	OK CC	Cause No. PUD201800140	Oklahoma Gas and Electric Company	Depreciation
308.	2019	MD PSC	Case No. 9490	FirstEnergy – Potomac Edison	Depreciation
309.	2019	SC PSC	Docket No. 2018-318-E	Duke Energy Progress	Depreciation
310.	2019	SC PSC	Docket No. 2018-319-E	Duke Energy Carolinas	Depreciation
311.	2019	DE PSC	DE 19-057	Public Service of New Hampshire	Depreciation
312.	2019	NY PSC	Case No. 19-W-0168 & 19-W-0269	SUEZ Water New York	Depreciation
313.	2019	PA PUC	Docket No. R-2019-3006904	Newtown Artesian Water Company	Depreciation
314.	2019	MO PSC	ER-2019-0335	Ameren Missouri	Depreciation
315.	2019	MO PSC	EC-2019-0200	KCP&L Greater Missouri Operations Company	Depreciation
316.	2019	MN DOC	G011/D-19-377	Minnesota Energy Resource Corp.	Depreciation
317.	2019	NY PSC	Case 19-E-0378 & 19-G-0379	New York State Electric and Gas Corporation	Depreciation
318.	2019	NY PSC	Case 19-E-0380 & 19-G-0381	Rochester Gas and Electric Corporation	Depreciation
319.	2019	WA UTC	Docket UE-190529 / UG-190530	Puget Sound Energy	Depreciation
320.	2019	PA PUC	Docket No. R-2019-3010955	City of Lancaster	Depreciation
321.	2019	IURC	Cause No. 45253	Duke Energy Indiana	Depreciation
322.	2019	KY PSC	Case No. 2019-00271	Duke Energy Kentucky, Inc.	Depreciation
323.	2019	OH PUC	Case No. 18-1720-GA-AIR	Northeast Ohio Natural Gas Corp	Depreciation
324.	2019	NC Util. Com.	Docket No. E-2, Sub 1219	Duke Energy Carolinas	Depreciation
325.	2019	FERC	Docket No. ER20-277-000	Jersey Central Power & Light Company	Depreciation
326.	2019	MA DPU	D.P.U. 19-120	NSTAR Gas Company	Depreciation
327.	2019	SC PSC	Docket No. 2019-290-WS	Blue Granite Water Company	Depreciation
328.	2019	NC Util. Com.	Docket No. E-2, Sub 1219	Duke Energy Progress	Depreciation
329.	2019	MD PSC	Case No. 9609	NiSource Columbia Gas of Maryland, Inc.	Depreciation
330.	2020	NJ BPU	Docket No. ER20020146	Jersey Central Power & Light Company	Depreciation
331.	2020	PA PUC	Docket No. R-2020-3018835	NiSource - Columbia Gas of Pennsylvania, Inc.	Depreciation
332.	2020	PA PUC	Docket No. R-2020-3019369	Pennsylvania-American Water Company	Depreciation
333.	2020	PA PUC	Docket No. R-2020-3019371	Pennsylvania-American Water Company	Depreciation
334.	2020	MO PSC	GO-2018-0309, GO-2018-0310	Spire Missouri, Inc.	Depreciation
335.	2020	NM PRC	Case No. 20-00104-UT	El Paso Electric Company	Depreciation
336.	2020	MD PSC	Case No. 9644	Columbia Gas of Maryland, Inc.	Depreciation
337.	2020	MO PSC	GO-2018-0309, GO-2018-0310	Spire Missouri, Inc.	Depreciation
338.	2020	VA St CC	Case No. PUR-2020-00095	Virginia Natural Gas Company	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
339.	2020	SC PSC	Docket No. 2020-125-E	Dominion Energy South Carolina, Inc.
340.	2020	WV PSC	Case No. 20-0745-G-D	Hope Gas, Inc. d/b/a Dominion Energy West Virginia
341.	2020	VA St CC	Case No. PUR-2020-00106	Aqua Virginia, Inc.
342.	2020	PA PUC	Docket No. R-2020-3020256	City of Bethlehem – Bureau of Water
343.	2020	NE PSC	Docket No. NG-109	Black Hills Nebraska
344.	2020	NY PSC	Case No. 20-E-0428 & 20-G-0429	Central Hudson Gas & Electric Corporation
345.	2020	FERC	ER20-598	Duke Energy Indiana
346.	2020	FERC	ER20-855	Northern Indiana Public Service Company
347.	2020	OR PSC	UE 374	Pacificorp
348.	2020	MD PSC	Case No. 9490 Phase II	Potomac Edison – Maryland
349.	2020	IN URC	Case No. 45447	Southern Indiana Gas and Electric Company
350.	2020	IN URC	IURC Cause No. 45468	Indiana Gas Company, Inc. d/b/a Vectren Energy
351.	2020	KY PSC	Case No. 2020-00349	Kentucky Utilities Company
352.	2020	KY PSC	Case No. 2020-00350	Louisville Gas and Electric Company
353.	2020	FERC	Docket No. ER21- 000	South FirstEnergy Operating Companies
354.	2020	OH PUC	Case Nos 20-1651-EL-AIR, 20-1652-EL-AAM & 20-1653-EL-ATA	Dayton Power and Light Company
355.	2020	OR PSC	UG 388	Northwest Natural Gas Company
356.	2020	MO PSC	Case No. GR-2021-0241	Ameren Missouri Gas
357.	2021	KY PSC	Case No. 2021-00103	East Kentucky Power Cooperative
358.	2021	MPUC	Docket No. 2021-00024	Bangor Natural Gas
359.	2021	PA PUC	Docket No. R-2021-3024296	Columbia Gas of Pennsylvania, Inc.
360.	2021	NC Util. Com.	Doc. No. G-5, Sub 632	Public Service of North Carolina
361.	2021	MO PSC	ER-2021-0240	Ameren Missouri
362.	2021	PA PUC	Docket No. R-2021-3024750	Duquesne Light Company
363.	2021	KS PSC	21-BHCG-418-RTS	Black Hills Kansas Gas
364.	2021	KY PSC	Case No. 2021-00190	Duke Energy Kentucky
365.	2021	OR PSC	Docket UM 2152	Portland General Electric
366.	2021	ILL CC	Docket No. 20-0810	North Shore Gas Company
367.	2021	FERC	ER21-1939-000	Duke Energy Progress
368.	2021	FERC	ER21-1940-000	Duke Energy Carolina
369.	2021	KY PSC	Case No. 2021-00183	NiSource Columbia Gas of Kentucky
370.	2021	MD PSC	Case No. 9664	NiSource Columbia Gas of Maryland
371.	2021	OH PUC	Case No. 21-0596-ST-AIR	Aqua Ohio
372.	2021	PA PUC	Docket No. R-2021-3026116	Hanover Borough Municipal Water Works
373.	2021	OR PSC	UM-2180	Idaho Power Company
374.	2021	ID PUC	Case No. IPC-E-21-18	Idaho Power Company
375.	2021	WPSC	6690-DU-104	Wisconsin Public Service Company

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	<u>Year</u>	<u>Jurisdiction</u>	<u>Docket No.</u>	<u>Client Utility</u>	<u>Subject</u>
376.	2021	PAPUC	Docket No. R-2021-3026116	Borough of Hanover	Depreciation
377.	2021	OH PUC	Case No. 21-637-GA-AIR; Case No. 21-638-GA-ALT; Case No. 21-639-GA-UNC; Case No. 21-640-GA-AAM	NiSource Columbia Gas of Ohio	Depreciation
378.	2021	TX PUC	Texas PUC Docket No. 52195; SOHA Docket No. 473-21-2606	El Paso Electric	Depreciation
379.	2021	MO PSC	Case No. GR.2021-0108	Spire Missouri	Depreciation
380.	2021	WV PSC	Case No. 21-0215-WS-P	West Virginia American Water Company	Depreciation
381.	2021	FERC	ER21-2736	Duke Energy Carolinas	Depreciation
382.	2021	FERC	ER21-2737	Duke Energy Progress	Depreciation
383.	2021	IN URC	Cause #45621	Northern Indiana Public Service Company	Depreciation
384.	2021	PA PUC	Docket No. R-2021-3026682	City of Lancaster	Depreciation

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust) Case No. GR-2021-0241
Its Revenues for Gas Service.)

AFFIDAVIT OF JOHN SPANOS

**COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CUMBERLAND) ss
)**

John Spanos, being first duly sworn on his oath, states:

My name is John Spanos, and on his oath declare that he is of sound mind and lawful age; that he has prepared the foregoing *Rebuttal Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.



John Spanos

Sworn to me this 14th day of October, 2021.