

Missouri Public Service Commission

Respond Data Request

FILED
August 19, 2019
Data Center
Missouri Public
Service Commission

Data Request No.	0045
Company Name	MO PSC Staff-(All)
Case/Tracking No.	EC-2019-0200
Date Requested	6/7/2019
Issue	Other - Other
Requested From	Mark Oligschlaeger
Requested By	David Woodsmall
Brief Description	AAOs
Description	At page 6, Mr. Oligschlaeger discusses GMO earnings. (a) Does Mr. Oligschlaeger believe that a company's earnings is an appropriate consideration for the determination of whether a deferral is appropriate? (b) Would Mr. Oligschlaeger agree that the Commission has previously rejected any consideration of utility earnings in the context of a request for an accounting authority order? (c) If the answer to (b) is no, please provide a citation to all cases in which the Commission considered a utility's earnings in its consideration of a request for an accounting authority order.
Response	Response: (a) No. (b) Yes. (c) Not applicable. Data Request Response submitted by Casi Aslin (Casi.Aslin@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. **EC-2019-0200** 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

MECG Exhibit No. 19
Date 8-8-19 Reporter Bjb
File No. EC-2019-0200

Missouri Public Service Commission

Respond Data Request

Data Request No.	0036
Company Name	MO PSC Staff-(All)
Case/Tracking No.	EC-2019-0200
Date Requested	6/7/2019
Issue	Other - Other
Requested From	Mark Oligschlaeger
Requested By	David Woodsmall
Brief Description	AAOs
Description	(a) Does Mr. Oligschlaeger agree that an extraordinary event may result in savings that are subject to deferral as a regulatory liability? (b) Does Mr. Oligschlaeger agree that, if an event is extraordinary, than the deferral of any savings is appropriate?
Response	Response: (a) Yes. (b) Deferral of savings associated with extraordinary events may be appropriate, depending upon the circumstances. Data Request Response submitted by Casi Aslin (Casi.Aslin@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. **EC-2019-0200** 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

Missouri Public Service Commission

Respond Data Request

Data Request No.	0035
Company Name	MO PSC Staff-(All)
Case/Tracking No.	EC-2019-0200
Date Requested	6/7/2019
Issue	Other - Other
Requested From	Mark Oligschlaeger
Requested By	David Woodsmall
Brief Description	AAOs
Description	At page 3, Mr. Oligschlaeger states "AAOs have usually be used to allow utilities to capture certain unanticipated costs that have not been included in ongoing rate levels." (a) Please provide a definition for Mr. Oligschlaeger's use of the word "unanticipated". (b) Please provide a citation to all Commission orders that Mr. Oligschlaeger is aware of that limits AAO deferrals to "unanticipated costs". (c) Please provide a citation to all previous testimony that Mr. Oligschlaeger has provided in which he claims that AAOs should be limited to unanticipated costs. (d) Does Mr. Oligschlaeger equate the word "anticipated" with GMO's use of the phrase "anticipated and communicated well in advance" (Klote Rebuttal, page 24). (e) Please provide a citation to the Uniform System of Accounts for Mr. Oligschlaeger's claim AAO deferrals should be limited to "unanticipated costs". (f) Would Mr. Oligschlaeger agree that, at the time that the Commission issued an AAO for the Sibley life extension and coal conversion (Case Nos. EO-90-114 and EO-91-358), that those costs were anticipated? If no, please explain why these costs were not anticipated. (g) Would Mr. Oligschlaeger agree that, at the time that the Commission issued an AAO for renewable energy costs (EU-2012-0131), that those costs were anticipated? If no, please explain why these costs were not anticipated. (h) Would Mr. Oligschlaeger agree that, at the time that the Commission issued AAOs for gas service line safe compliance costs (Case Nos. GO-90-115, GO-90-215, GR-91-291, GO-91-359, GO-92-67, GO-92-185, GO-94-133, GR-94-220, GO-94-234, GR-96-193, GO-97-301, GR-98-140, GR-99-315, and GR-2001-292), that those costs were anticipated? If no, please explain why these costs were not anticipated. (i) Would Mr. Oligschlaeger agree that, at the time that the Commission provided for a continuation of construction accounting (i.e., deferral of depreciation and carrying costs) association with the construction of latan 2, that those costs were anticipated? If no, please explain why these costs were not anticipated. (j) Would Mr. Oligschlaeger agree that, at the time that the Commission issued an AAO for the AM / FM Mapping costs (Case No. EO-91-247), that those costs were anticipated? If no, please explain why these costs were not anticipated. (k) Would Mr. Oligschlaeger agree that, at the time that the Commission issued an AAO for the water main replacement costs (Case No. WR-95-145, WO-96-234, WR-96-263, WO-98-223 and WR-00-844), that those costs were anticipated? If no, please explain why these costs were not anticipated. (l) Given the frequency with which floods have occurred in the last 25 years, does Mr. Oligschlaeger still believe that a "major flood that affects a utility's service territory" is unusual or unique in nature" (see Oligschlaeger Cross Rebuttal, page 3).
Response	Response: (a) "Unanticipated" generally means unexpected or unplanned. (b) Mr. Oligschlaeger is aware of no such orders. (c) Mr. Oligschlaeger has not taken the position in the past and is not taking the position in the current case that AAOs "should be limited to 'unanticipated costs'." Note Mr. Oligschlaeger's cross-rebuttal testimony in this proceeding that "AAOs have usually been used to allow utilities to capture certain unanticipated costs..." (Page 3; emphasis added). (d) Mr. Oligschlaeger's reference to "unanticipated costs" in his cross-rebuttal testimony was not specifically intended to equate with the quoted reference from Mr. Klote's rebuttal testimony. (e) Staff is not claiming that "AAO deferrals should be limited to 'unanticipated costs'." (f) Staff agrees that those costs were "anticipated." (g) Staff agrees that those costs were "anticipated." (h) Staff generally agrees that such costs were "anticipated." (i) Staff agrees that such costs were "anticipated." (j) Staff agrees that such costs were "anticipated." (k) Staff's understanding and recollection is that the water main costs that were the subject of the listed cases were in the nature of repair expenses, and not capital replacement costs. As such, Staff does not agree that such costs were reasonably "anticipated." (l) Mr. Oligschlaeger still believes that "major floods" should be considered as unusual or unique in nature. Data Request Response submitted by Casi Aslin (Casi.Aslin@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. **EC-2019-0200** 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

Missouri Public Service Commission

Respond Data Request

Data Request No.	0037
Company Name	MO PSC Staff-(All)
Case/Tracking No.	EC-2019-0200
Date Requested	6/7/2019
Issue	Other - Other
Requested From	Mark Oligschlaeger
Requested By	David Woodsmall
Brief Description	AAOs
Description	In reaching his conclusion that "utility asset retirements generally should not be considered to be extraordinary", does Mr. Oligschlaeger distinguish in any way between lifespan assets and mass property assets? If yes, please describe how he accounts for distinctions between lifespan and mass property assets.
Response	Response: No. Data Request Response submitted by Casi Aslin (Casi.Aslin@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. **EC-2019-0200** 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