

**FILED<sup>2</sup>**

**JAN 5 2017**

**Missouri Public  
Service Commission**

*Exhibit No.:*

*Issue: Infrastructure System  
Replacement Surcharge*

*Witness: Caroline Newkirk*

*Sponsoring Party: MoPSC Staff*

*Type of Exhibit: Direct Testimony*

*Case No.: GO-2016-0332*

*Date Testimony Prepared: December 16, 2016*

**MISSOURI PUBLIC SERVICE COMMISSION**

**COMMISSION STAFF DIVISION**

**AUDITING**

**DIRECT TESTIMONY**

**OF**

**CAROLINE NEWKIRK**

*Staff* Exhibit No. 1  
Date 1-03-17 Reporter HF  
File No. GO-2016-0332  
GO-2016-0333

**MISSOURI GAS ENERGY**

**CASE NO. GO-2016-0332**

*Staff 1*

*Jefferson City, Missouri  
December, 2016*

1 DIRECT TESTIMONY  
2 OF  
3 CAROLINE NEWKIRK  
4 MISSOURI GAS ENERGY  
5 CASE NO. GO-2016-0332

6 Q. Please state your name and business address.

7 A. Caroline Newkirk, P.O. Box 360, Suite 440, Jefferson City, MO 65102.

8 Q. By whom are you employed and in what capacity?

9 A. I am employed by the Missouri Public Service Commission ("Commission")  
10 as a Utility Regulatory Auditor I.

11 Q. Please describe your educational background and work experience.

12 A. I graduated from University of Central Missouri in Warrensburg, Missouri,  
13 with a Bachelor of Science in Business Administration with an emphasis in Accounting, in  
14 December 2011. I have previously worked in various jobs in the areas of bookkeeping, tax  
15 preparation, and cost accounting since my graduation date. I began my employment with the  
16 Commission in October 2016.

17 Q. Have you previously filed testimony before this Commission?

18 A. No.

19 Q. What is the purpose of your testimony in this case?

20 A. I am sponsoring Auditing Staff's recommendation for Missouri Gas Energy's  
21 (MGE or "Company") Infrastructure System Replacement Surcharge (ISRS) application for  
22 Case No. GO-2016-0332, which is attached as Schedule CNN-d1. Staff witness Jennifer

Direct Testimony of  
Caroline N. Newkirk

1 Grisham will address the ISRS application for Laclede Gas Company for Case No. GO-2016-  
2 0333 in her direct testimony filed in that proceeding.

3 Q. Are you the same Caroline N. Newkirk who contributed to the Memorandum  
4 attached as Appendix A to the Staff Recommendation filed on November 29, 2016, in Case  
5 No. GO-2016-0332?

6 A. Yes.

7 Q. Is the information contained in the Staff Recommendation still true and  
8 accurate to the best of your knowledge?

9 A. Yes, with one exception. On page 3 of Staff's Memorandum, Staff reflected  
10 an incorrect date for when certain information was provided to it during this ISRS audit. The  
11 memorandum states that on October 10, 2016, work authorizations for September 2016 were  
12 provided to Staff by MGE. The date that work authorizations for September 2016 were  
13 actually provided by MGE was October 20, 2016.

14 Q. Did Staff perform a "true-up" review of ISRS information relating to  
15 qualifying plant additions made during the months of September - October 2016 which was  
16 not available at the time MGE filed its application on September 30, 2016?

17 A. Yes.

18 Q. When did Staff receive true-up information from MGE?

19 A. True-up information for September 2016 work orders was received on October  
20 20, 2016. True-up information for October 2016 work orders was provided to Staff on  
21 November 10, 2016.

22 Q. Did Staff have an adequate opportunity to review the true-up information prior  
23 to filing its recommendation on November 29, 2016?

Direct Testimony of  
Caroline N. Newkirk

1           A.    Yes, Staff had adequate time to review the true-up information and  
2   communicate with MGE personnel for clarification purposes prior to filing its  
3   recommendation on November 29, 2016.

4           Q.    Does this conclude your direct testimony in this proceeding?

5           A.    Yes, it does.

MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File  
Case No. GO-2016-0332, Tariff Tracking No. YG-2017-0048  
Missouri Gas Energy

**FROM:** Caroline Newkirk, Regulatory Auditor, Auditing Department  
Michael J. Ensrud, Rate & Tariff Examiner II, Procurement Analysis

/s/ Mark L. Oligschlaeger 11/29/16  
Auditing Department / Date

/s/ David M. Sommerer 11/29/16  
Commission Staff Division / Date

/s/ Jeffrey A. Keevil 11/29/16  
Staff Counsel's Office / Date

**SUBJECT:** Staff Report and Recommendation Regarding Verified Application and Petition of Missouri Gas Energy, an Operating Unit of Laclede Gas Company, to Change its Infrastructure System Replacement Surcharge in its Missouri Gas Energy Service Territory

**DATE:** November 29, 2016

**BACKGROUND**

On September 30, 2016 Missouri Gas Energy ("MGE" or "Company"), an operating unit of Laclede Gas Company, filed the "Verified Application and Petition of Missouri Gas Energy, an Operating Unit of Laclede Gas Company, to Change its Infrastructure System Replacement Surcharge in its Missouri Gas Energy Service Territory" with the Missouri Public Service Commission ("Commission"). The Application proposes to increase MGE's Infrastructure System Replacement Surcharge (ISRS) rates and implement a revised Tariff Sheet with a proposed effective date of October 30, 2016.

MGE made its filing pursuant to Sections 393.1009, 393.1012 and 393.1015 of the Revised Statutes of Missouri and Commission Rules 4 CSR 240-2.060, 2.080, and 3.265, which allow Missouri natural gas corporations to file a petition and proposed rate schedule with the Commission to recover certain infrastructure system replacement costs outside a formal rate case, through a surcharge on customers' bills.

MGE asserts that it has continued to incur costs related to ISRS-eligible infrastructure system replacements since the Commission's last decision in Case No. GO-2016-0197 and submitted its Application to reflect ISRS investments for the period from March 1, 2016 through August 31, 2016, with pro-forma ISRS costs updated through October 31, 2016. MGE estimated in its Application that it was entitled to an incremental increase of ISRS revenues in this case of \$3,451,810.

In relation to notice requirements, Laclede Gas Company, on behalf of MGE, has filed the following on June 9, 2016:

LACLEDE GAS AND MISSOURI GAS ENERGY'S REQUEST FOR WAIVER OF  
RULE 4.020(2) FOR ISRS CASE FILINGS, OR IN THE ALTERNATIVE, NOTICE OF  
INTENDED CASE FILINGS

This submission suffices for notice under 4 CSR 240-4.020(2). However, the waiver request should be denied, particularly in light of the fact that revisions to the Commission's *ex parte* rules are currently under consideration by the Commission.

On October 3, 2016, the Commission issued an "Order Directing Notice, Setting Intervention Deadline, Directing Filing and Suspending Tariff." That Order set the following dates:

- Staff's Recommendation shall be filed no later than November 29, 2016
- Suspension of the tariff sheet until January 28, 2017

**STAFF REVIEW AND REVENUE CALCULATIONS**

On September 30, 2016, Missouri Gas Energy ("MGE" or "Company"), an operating unit of Laclede Gas Company, filed an application and tariff sheet in Case No. GO-2016-0332 to change its Infrastructure System Replacement Surcharge (ISRS). This is the fifth ISRS filing since the Company's most recent general rate case, Case No. GR-2014-0007. The results of the preceding ISRS cases are currently included in MGE's ISRS rates: Case Nos. GR-2015-0025, GO-2015-0270, GO-2015-0343, and GO-2016-0197.

Section 393.1015.3, RSMo, states, "A gas corporation may effectuate a change in its rate pursuant to the provisions of this section no more often than two times every twelve months." The MGE tariff filed with this Application has been suspended until **January 28, 2017**. In Case No. GO-2015-0343, which was filed in August of 2015, the effective date for MGE's revised ISRS rates was December 1, 2015. Since that date, MGE has changed its ISRS surcharge one additional time, in Case No. GO-2016-0197. Based upon MGE's previous ISRS filings and the statute, Staff recommends the tariff for this ISRS filing should not go into effect prior to December 1, 2016.

Commission Rule 4 CSR 240-3.265(18) states, "... The commission shall reject an ISRS petition after a commission order in a general rate proceeding unless the ISRS revenues requested in the petition, on an annualized basis, will produce ISRS revenues of at least the lesser of one-half of one percent (1/2%) of the natural gas utility's base revenue level approved by the commission in the natural gas utility's most recent general rate case proceeding or one (1) million dollars, but

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not in excess of ten percent (10%) of the subject utility's base revenue level approved by the commission in the utility's most recent general rate proceeding." MGE's requested ISRS revenues exceeds the one-half of one percent of the natural gas utility's base revenue level approved by the commission in the most recent MGE rate case and MGE's cumulative ISRS revenues, including this filing, do not exceed ten percent of the base revenue levels approved by the commission in the last MGE rate case.

In this Application, MGE filed to recover ISRS qualifying infrastructure replacement costs incurred during the period of March 1, 2016 through October 31, 2016. The ISRS recovery requested for September and October 2016 plant additions was included on an estimated basis at the time MGE's Application was filed, but documentation supporting actual ISRS plant addition costs for these months was supplied by MGE during the course of Staff's review and audit in this case.

As part of its examination of MGE's application, Auditing Staff reviewed supporting workpapers, a representative sample of work orders, invoices, and other applicable documentation, such as work order authorizations. Staff also communicated with MGE personnel to clarify MGE's application when necessary.

The following documentation was provided to Staff on the following dates:

- October 3, 2016 - Work order authorizations for ISRS projects over \$50,000 for the months of March 1, 2016 thru August 31, 2016.
- October 10, 2016 - Work authorizations for September 2016.
- November 10, 2016 – Work authorizations for October 2016 and a sample of invoices and work orders related to costs incurred between March 1, 2016 and September 30, 2016.
- November 18, 2016 - A sample of invoices for October 2016.
- November 21, 2016 – A sample of a work order for October 2016.

Commission Rule 4 CSR 240-3.265 sets forth the definitions of natural gas utility plant projects that are eligible for ISRS treatment. Staff concluded each of the projects reviewed meets the ISRS rule qualifications.

The methodology used by the Auditing Staff allows for consideration of all accumulated depreciation and deferred income taxes on ISRS qualifying infrastructure replacement costs through December 15, 2016. This methodology is consistent with past reviews conducted by Auditing Staff and with Staff's view that the calculation of the ISRS revenue requirement should closely reflect the revenue requirement at the effective date of the ISRS rates.

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Auditing staff also included incremental accumulated depreciation, accumulated deferred income tax, and any change in property tax rates for replacements associated with the currently effective ISRS authorized for MGE in Case Nos. GR-2015-0025, GO-2015-0270, GO-2015-0343, and GO-2016-0197 as required by 4 CSR 240-3.265(20)(K).

**STAFF RECONCILIATION**

Commission Rule 4 CSR 240-3.265(17) requires a reconciliation of the ISRS revenue MGE collected from customers in the prior 12-month period to account for over or under-collection of ISRS revenue. Since a reconciliation of revenues collected thru December 31, 2015 was performed in the last ISRS rate case, Case No. GO-2016-0197, it is not necessary for Staff to perform a reconciliation of surcharges for purposes of this case because the required twelve-month (12) period provided in 4 CSR 240-3.265(17) has not elapsed.

**AUDITING SUMMARY AND CONCLUSIONS**

Based upon its review and calculations made in response to this ISRS Application, Staff recommends MGE receive additional ISRS revenues of \$3,362,598. This amount differs from MGE's updated work papers in that staff removed a \$72 transposition error on one of the Company's journal entries. Staff found this error when reviewing invoices. Upon Commission approval, this amount will be included with ISRS rates currently in effect from Case Nos. GR-2015-0025, GO-2015-0270, GO-2015-0343, and GO-2016-0197. The following table shows the cumulative amount to be included in rates:

ISRS Case No.	Revenue Requirement	Cumulative
GR-2015-0025	\$1,990,296	
GO-2015-0270	\$2,814,926	\$4,805,222
GO-2015-0343	\$1,878,151	\$6,683,373
GO-2016-0197	\$3,570,050	\$10,253,423
GO-2016-0332	\$3,362,598	\$13,616,021

**THE ISRS RATE SCHEDULES**

Staff's recommended rates are consistent with the methodology used to establish MGE's past ISRS rates and consistent with the overall methodology used to establish ISRS rates for other gas utilities. Staff's recommended ISRS rates are contained in Appendix B, attached hereto and incorporated by reference herein.

Staff has verified that MGE has filed its 2015 annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing, other than MGE's last two ISRS cases which are currently on appeal.

### RECOMMENDATION

Based upon the rationale stated above, Staff recommends the Commission issue an order in this case that:

1. Rejects MGE's ISRS tariff sheet (YG-2017-0048) P.S.C MO No. 6 Seventh Revised Sheet No. 10 cancelling P.S.C. MO No. 6 Sixth Revised Sheet No. 10 filed on September 30, 2016;
2. Approves the Staff's recommended ISRS surcharge revenues in this docket in the incremental pre-tax revenue amount of \$3,362,598;
3. Authorizes MGE to file an ISRS rate for each customer class as reflected in Appendix B, which generates \$13,616,021 annually.

MGE  
 ISRS Rate Design  
 Total ISRS Revenues

CASE NO. GO-2016-0332

FILE NO. YG-2017-0048

Total Revenue Requirement \$ 13,616,021

Customer Rate Class	Number of Customers	Customer Charge	Ratio to Residential Customer Charge	Weighted Customer Nos.	Customer Percentage	Proposed ISRS Charge	Proposed ISRS Revenues
Residential	445,941	\$ 23.00	1	445,941	78.5626%	\$ 2.00	\$ 10,697,098
Small General Service	57,881	\$ 34.00	1.478261	85563.21739	15.0739%	\$ 2.96	\$ 2,052,465
Large General Service	3,421	\$ 115.40	5.017391	17164.49565	3.0239%	\$ 10.03	\$ 411,737
Large Volume	482	\$ 904.56	39.328696	18956.4313	3.3396%	\$ 78.62	\$ 454,721
	<u>507,725</u>			<u>567,625</u>			<u>\$ 13,616,021</u>

\*Due to rounding to the nearest penny, the designed ISRS rates will under collect by \$8986. However, it should be noted that the total amount will be trued-up at a later date.

Appendix B



