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Issue(s):	*Net Operating Loss*
Witness:	*Mark L. Oligschlaeger*
Sponsoring Party:	*MoPSC Staff*
Type of Exhibit:	*Direct Testimony*
Case No.:	*WO-2018-0373*
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

AUDITING DEPARTMENT

DIRECT TESTIMONY

OF

MARK L. OLIGSCHLAEGER

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WO-2018-0373

Staff
MAWC Exhibit No. 3
Date 11-20-18 Reporter Bjb
File No. WO-2018-0373

Jefferson City, Missouri
November 2018

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DIRECT TESTIMONY

OF

MARK L. OLIGSCHLAEGER

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WO-2018-0373

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DIRECT TESTIMONY

OF

MARK L. OLIGSCHLAEGER

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WO-2018-0373

Q. Please state your name and business address.

A. Mark L. Oligschlaeger, P.O. Box 360, Suite 440, Jefferson City, MO 65102.

Q. Please describe your educational background and work experience.

A. I attended Rockhurst College in Kansas City, Missouri, and received a Bachelor of Science degree in Business Administration, with a major in Accounting, in 1981. I have been employed by the Missouri Public Service Commission ("Commission") since September 1981 within the Auditing Department.

Q. What is your current position with the Commission?

A. In April 2011, I assumed the position of Manager of the Auditing Department, Commission Staff Division, of the Commission.

Q. Are you a Certified Public Accountant (CPA)?

A. Yes, I am. In November 1981, I passed the Uniform Certified Public Accountant examination and, since February 1989, have been licensed in the state of Missouri as a CPA.

Q. Have you previously filed testimony before this Commission?

A. Yes, numerous times. A listing of the cases in which I have previously filed testimony before this Commission, and the issues I have addressed in testimony in cases from 1990 to current, is attached as Schedule MLO-d1 to this direct testimony.

Q. What knowledge, skills, experience, training and education do you have in the areas of which you are testifying as an expert witness?

A. I have been employed by this Commission as a Regulatory Auditor for approximately 37 years and have submitted testimony on ratemaking matters numerous times before the Commission. I have also been responsible for the supervision of other Commission employees in rate cases and other regulatory proceedings many times. I have received continuous training at in-house and outside seminars on technical ratemaking matters since I began my employment at the Commission.

EXECUTIVE SUMMARY

Q. Please summarize your direct testimony in this proceeding.

A. In this testimony, I will provide support for Staff's recommendation that was filed in this proceeding on October 19, 2018, regarding Missouri-American Water Company's (MAWC) proposal that its Infrastructure System Replacement Surcharge (ISRS) rate base be increased to reflect an amount representing the impact of a purported income tax "net operating loss" (NOL) associated with ISRS plant in service additions. I will explain from a policy perspective the reasons for Staff's recommendation that the Commission reject MAWC's NOL proposal in this proceeding.

Q. Are other witnesses filing direct testimony concerning this issue on behalf of Staff in this case?

A. Yes. Staff witness Lisa Ferguson of the Auditing Department is submitting direct testimony on the NOL issue as well.

TAX NORMALIZATION AND NOL CONCEPTS

Q. Please provide an overview of the concepts of income tax normalization.

A. Under the Internal Revenue Service Code ("IRS Code"), a company is allowed to deduct certain costs against income for tax purposes at different times than when it is allowed to reflect the same costs as a reduction to income for financial reporting purposes. The existence of these book/tax timing differences ("timing differences") usually provide a net tax benefit to business entities, in that most timing differences serve to reduce a business entity's taxable income levels below the level of its reported financial income. An example of a timing difference that results in significant financial benefits to companies is the ability of the companies to use "accelerated depreciation" deductions for tax purposes under the IRS Code, in contrast to the straight-line book depreciation methods companies rely upon in determining their financial income.

Q. How is the financial impact of tax timing differences treated for ratemaking purposes for regulated utilities?

A. For rate purposes, the tax benefits associated with timing differences can either be assigned to ratepayers upfront by reducing the amount of income tax expense the utility would otherwise recover from its customers (i.e., the "flow-through" method of ratemaking for income taxes), or those benefits can be retained by the utility for a period of time before being passed on to ratepayers (the "normalization" method of ratemaking for income taxes). For utility ratemaking, the concept of tax normalization is applied by collecting income tax expense amounts in rates calculated as if the particular tax deduction or treatment was not available to the utility.

Q. Who determines whether flow-through or normalization treatment is provided to utilities in setting rates for income taxes?

A. For most timing differences, that decision would be made by the utilities' regulatory commissions. However, in regard to the specific timing differences associated with use of accelerated depreciation methods for tax purposes, the IRS Code effectively mandates that regulatory commissions normalize the benefits of the accelerated depreciation tax deductions in setting rates.[1] If the regulatory commissions do not allow for such normalization treatment, that action could result in loss of the entire accelerated depreciation deduction by the utility.

Q. Please summarize the impact of the tax normalization provisions in the IRS Code regarding accelerated depreciation on utility ratemaking.

A. In essence, the tax normalization requirements of the IRS Code mandate that utility rates be set so that customers do not receive the tax benefit of accelerated depreciation deductions any faster than over the estimated straight-line book lives authorized for the utilities' assets.

Q. When the tax normalization approach is used in setting rates, how is the financial impact of this approach on utilities accounted for?

A. With use of the tax normalization approach, customers will in almost all circumstances pay an amount of income tax expense in rates that exceeds the utilities' actual current income tax liabilities to federal and state taxing authorities. The portion of the expense collected from customers that is actually paid to taxing authorities in the short-term is charged to *current* income tax expense accounts. The portion of the income tax expense collected from customers that will be retained by the utility until later periods is charged to *deferred* income tax expense accounts. Because the amounts paid in by customers for deferred income tax expense represents capital that the utilities can use for a period of time, it is appropriate to provide customers a return on this capital contribution. This is accomplished

[1] Treasury Regulation 1.167(l)-1

by reducing the utility's rate base by the balance of its net collection of accumulated deferred income taxes (ADIT) at a point in time.

Q. Are deferred income taxes taken into account in ISRS rate calculations?

A. Yes, as required by statute. The purpose of the ISRS process is to allow for single-issue rate recovery of costs associated with certain gas and water plant infrastructure projects. Through the ISRS process, a utility is able to recover a return on qualifying plant additions outside of a general rate proceeding. However, the amount of the required return on rate base for ISRS plant additions is netted against the amount of booked deferred income taxes associated with the ISRS additions, to recognize that customers as well as the utility have invested capital related to the plant additions.

Q. What is a "net operating loss?"

A. An NOL results when a utility does not have enough taxable income to utilize all of the tax deductions to which it would otherwise be entitled. When this situation occurs, the amount of the unused deductions is referred to as an "NOL" and is booked to a deferred tax asset account.

Q. Does the existence of an NOL represent a permanent loss to a company?

A. No. Once an NOL is booked, it can be used as a "carry-forward" amount to offset any positive taxable income amounts in future years.

Q. Why would a utility find itself in an NOL situation?

A. Since the time of the financial crisis that occurred approximately ten years ago, and through the end of 2017, the IRS Code allowed business entities very generous accelerated depreciation deductions. These deductions were commonly referred to as "bonus depreciation." Largely because of the availability of bonus depreciation tax benefits, some utilities, including MAWC, have been in NOL situations for a number of years.

Q. How would NOLs be taken into account as part of tax normalization ratemaking for accelerated depreciation tax timing differences?

A. Utilities have argued that the rate base reduction for ADIT must be offset by amounts related to incurred NOLs, to reflect that the companies were not able to currently use all of the tax deductions available to them and for which deferred taxes were booked. The utilities claim that failure to recognize the NOL offset for ratemaking purposes would constitute a violation of the normalization provisions of the IRS Code, by effectively passing accelerated depreciation deduction benefits on to customers prematurely.

Staff generally agrees with this position, though the affected utilities would need to demonstrate that the NOLs resulted from regulated activity, and that the utilities did not receive any actual cash flow benefit from the depreciation deductions giving rise to the NOLs, before NOLs are included in utility rate base.

Q. At this time, are utilities still able to utilize bonus depreciation deductions?

A. No. Due to the provisions of the Tax Cuts and Jobs Act, utilities are not allowed to claim bonus depreciation deductions past 2017.

NET OPERATING LOSS ISSUE

Q. What is the issue in this proceeding regarding NOLs?

A. MAWC has taken the position that an NOL amount should be offset against the ADIT balance in rate base for purposes of determining ISRS rates in this case.

Q. What is the ISRS period in this case?

A. The ISRS period extends from January 1, 2018, through September 30, 2018. Only costs directly associated with qualifying ISRS plant that became in-service during those nine months should be reflected in ISRS rates resulting from this proceeding.

Q. Has MAWC generated any amount of net NOL to date in 2018?

A. No. In fact, according to its response to Staff Data Request No. 0004, MAWC expects to use prior booked amounts of NOL as carry-forwards to offset taxable income in 2018 and 2019. This means that MAWC is projecting that it will be able to reflect all of its net accelerated depreciation benefits associated with new ISRS plant additions on its books during the next two years without the need to record any new offsetting NOL amount. In other words, MAWC is no longer "generating" an NOL; it is instead in the position of "using" the NOL booked in prior years to reduce future taxable income.

Staff witness Ferguson has attached MAWC's response to Staff Data Request No. 0004 to her direct testimony, and is further addressing quantification of the ongoing MAWC NOL balance amounts in more detail in that testimony.

Q. If MAWC has not generated any net NOL amounts thus far in this ISRS period, what is the basis for its position that an NOL amount should be reflected in its ISRS rate base?

A. Given the absence of any incurred NOL amount on MAWC's books thus far in 2018, MAWC is actually recommending in this case that a "hypothetical" NOL amount allegedly associated with ISRS plant additions be imputed into rate base. MAWC argues that such an imputation is required in order to comply with the accelerated depreciation normalization requirements in the IRS Code. Staff does not agree.

Q. What appears to be the theoretical basis for MAWC's position on this matter?

A. In a conference call with Staff, MAWC stated that the ISRS process in 2018 has resulted in a delay in the rate at which it can use the prior accumulated NOL as a carry-forward against future taxable income. This is because the addition of ISRS plant to MAWC's rate base without immediate receipt of new revenues reduces its taxable income amount below the level that would result if the ISRS plant addition had not been made. MAWC is arguing that the theoretical reduction in taxable income allegedly caused by ISRS plant additions made outside of a rate case somehow implicates the tax normalization requirements in the IRS Code.

Q. Does Staff agree that this is a relevant point in relation to tax normalization ratemaking?

A. No. MAWC engages in a multitude of financial transactions over time that will result in either increases or decreases to its taxable income. For example, MAWC's ongoing non-ISRS plant additions made outside of a rate proceeding will theoretically reduce its taxable income in the exact same manner as MAWC alleges that ISRS plant additions do. Regardless, Staff is not aware of any claims by utilities that the impact on taxable income of plant additions in general would or could trigger the normalization requirements of the IRS code in regard to NOLs and require imputation of hypothetical NOL amounts in rate base in any ratemaking context.

Staff witness Ferguson will further address the problems with MAWC's calculation of the hypothetical NOL in her direct testimony.

Q. Has MAWC cited any sources for its belief that imputation of a hypothetical NOL in this case is necessary or appropriate in this instance?

A. Yes. In data request responses and in discussions with Staff, MAWC generally referred to both the normalization provisions in the IRS Code as well as to certain "private letter rulings" issued by the IRS in recent years as supporting its NOL position in this case.

Staff has reviewed both the relevant sections of the IRS Code and the private letter rulings, and has found nothing therein that would even remotely require an imputation of an

NOL for tax normalization reasons in the situation in which no actual NOL is, in fact, being generated or recorded by a utility.

Q. If Staff's position on the NOL issue is adopted in this case, could that potentially lead to a violation of the normalization requirements for accelerated depreciation benefits in the Code?

A. As previously stated, Staff has seen no support for this contention, based upon its review of the IRS Code and the private letter rulings cited by MAWC. Further, Staff's position on this issue is fully consistent with what it understands to be the intent of the accelerated depreciation normalization requirements in the IRS Code. Under Staff's proposed treatment of ADIT in this case, the tax benefits of accelerated depreciation associated with ISRS plant additions in this ISRS period will not be passed on to customers prematurely in a manner that violates the IRS Code. Rather, as it relates to its ISRS plant additions, MAWC will be able to receive the benefit of the full amount of the accelerated depreciation tax deductions available to it.

Q. What would be the consequences if MAWC's position on this issue in this case were adopted?

A. Acceptance of MAWC's position in this proceeding would result in an overstatement of both ISRS rate base and ISRS customer rates, and, in addition, fail to appropriately compensate customers for the capital they provide to MAWC in rates on an ongoing basis due to ISRS plant additions.

Q. Does this conclude your direct testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In The Matter of Petition of Missouri-American Water Company for Approval to Establish an Infrastructure System Replacement Surcharge (ISRS)	))))	**<u>Case No. WO-2018-0373</u>** Tariff No. YW-2019-0018

<u>AFFIDAVIT OF MARK L. OLIGSCHLAEGER</u>

State of Missouri)
) ss.
County of Cole)

COMES NOW Mark L. Oligschlaeger, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Direct Testimony*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Mark L. Oligschlaeger
Mark L. Oligschlaeger

<u>JURAT</u>

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13th day of November, 2018.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070

D Suzie Mankin
NOTARY PUBLIC

CASE PARTICIPATION OF MARK L. OLIGSCHLAEGER

Company Name	Case Number	Issues
Spire Missouri, Inc. d/b/a Spire	GU-2019-0011	**Rebuttal:** Commission Assessment AAO
The Empire District Electric Company	ER-2018-0366	**Rebuttal:** Tax Reform
Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company	ER-2018-0145 and ER-2018-0146	**Surrebuttal:** Tax Cuts and Jobs Act
Union Electric Company, d/b/a Ameren Missouri	ET-2018-0132	**Rebuttal:** Accounting and Ratemaking
Empire District, a Liberty Utilities Company	EO-2018-0092	**Rebuttal:** Ashbury Regulatory Asset; Affiliate Transaction Variance
Liberty Utilities (Midstates Natural Gas) Corp., d/b/a Liberty Utilities	GR-2018-0013	**Rebuttal:** Tracker Proposals **Surrebuttal:** Tracker Proposals; Pensions/OPEBs
Missouri-American Water Company	WR-2017-0285	**Direct:** Future Test Year **Rebuttal:** Future Test Year New Tax Legislation
Spire Missouri, Inc., d/b/a Spire (Laclede Gas Company / Missouri Gas Energy)	GR-2017-0215 and GR-2017-0216	**Rebuttal:** Tracker Proposals; Other Policy Proposals; Software Costs
Missouri-American Water Company	WU-2017-0351	**Rebuttal:** Property Tax AAO **Surrebuttal:** Property Tax AAO
Missouri Gas Energy and Laclede Gas Company	GO-2016-0332 and GO-2016-0333	**Rebuttal:** ISRS Updates; Capitalized Incentive Compensation; Hydrostatic Testing
Kansas City Power & Light Company	ER-2016-0285	**Rebuttal:** Tracker Proposals; Use of Projected Expenses; Expense Trackers in Rate Base
Laclede Gas Company and Missouri Gas Energy	GO-2016-0196 and GO-2016-0197	**Rebuttal:** ISRS True-ups
Union Electric Company, d/b/a Ameren Missouri	ER-2016-0179	**Rebuttal:** Transmission Tracker; Noranda Deferral; Regulatory Reform
KCP&L Greater Missouri Operations Company	ER-2016-0156	**Rebuttal:** Tracker Proposals; Use of Projected Expenses; Tracker Balances in Rate Base; Deferral Policy

CASE PARTICIPATION OF
MARK L. OLIGSCHLAEGER

Company Name	Case Number	Issues
Missouri-American Water Company	WR-2015-0301	**Rebuttal:** Environmental Coast Adjustment Mechanism; Energy Efficiency and Water Loss Reduction Deferral Mechanism Tracker
Laclede Gas Company	GO-2015-0178	**Direct:** ISRS True-ups
Kansas City Power & Light Company	EU-2015-0094	**Direct:** Accounting Order – Department of Energy Nuclear Waste Fund Fees
Union Electric Company, d/b/a Ameren Missouri (2018)	EO-2015-0055	**Rebuttal:** MEEIA Accounting Conditions
Union Electric Company, d/b/a Ameren Missouri (2015)	EO-2015-0055	**Rebuttal:** Demand-Side Investment Mechanism
Kansas City Power & Light Company	ER-2014-0370	**Rebuttal:** Trackers **Surrebuttal:** Trackers; Rate Case Expense
Kansas City Power & Light Company	EO-2014-0255	**Rebuttal:** Continuation of Construction Accounting
Union Electric Company, d/b/a Ameren Missouri	EC-2014-0223	**Rebuttal:** Complaint Case – Rate Levels
Kansas City Power & Light Company	EO-2014-0095	**Rebuttal:** DSIM
Union Electric Company, d/b/a Ameren Missouri	ET-2014-0085	**Surrebuttal:** RES Retail Rate Impact
Kansas City Power & Light Company & KCP&L Greater Missouri Operations Co.	EU-2014-0077	**Rebuttal:** Accounting Authority Order
Kansas City Power & Light Company	ET-2014-0071	**Rebuttal:** RES Retail Rate Impact **Surrebuttal:** RES Retail Rate Impact
KCP&L Greater Missouri Operations Company	ET-2014-0059	**Rebuttal:** RES Retail Rate Impact **Surrebuttal:** RES Retail Rate Impact
Missouri Gas Energy, A Division of Laclede Gas Company	GR-2014-0007	**Surrebuttal:** Pension Amortizations
The Empire District Electric Company	ER-2012-0345	**Direct (Interim):** Interim Rate Request **Rebuttal:** Transmission Tracker, Cost of Removal Deferred Tax Amortization; State Income Tax Flow-Through Amortization **Surrebuttal:** State Income Tax Flow-Through Amortization

CASE PARTICIPATION OF
MARK L. OLIGSCHLAEGER

Company Name	Case Number	Issues
KCP&L Greater Missouri Operations Company	ER-2012-0175	**Surrebuttal:** Transmission Tracker Conditions
Kansas City Power & Light Company	ER-2012-0174	**Rebuttal:** Flood Deferral of off-system sales **Surrebuttal:** Flood Deferral of off-system sales, Transmission Tracker conditions
Union Electric Company, d/b/a Ameren Missouri	ER-2012-0166	**Responsive:** Transmission Tracker
Union Electric Company, d/b/a Ameren Missouri	EO-2012-0142	**Rebuttal:** DSIM
Union Electric Company, d/b/a Ameren Missouri	EU-2012-0027	**Rebuttal:** Accounting Authority Order **Cross-Surrebuttal:** Accounting Authority Order
KCP&L Greater Missouri Operations Company	EO-2012-0009	**Rebuttal:** DSIM
Missouri Gas Energy, a Division of Southern Union	GU-2011-0392	**Rebuttal:** Lost Revenues **Cross-Surrebuttal:** Lost Revenues
Missouri-American Water Company	WR-2011-0337	**Surrebuttal:** Pension Tracker
The Empire District Electric Company	ER-2011-0004	**Staff Report on Cost of Service: Direct:** Report on Cost of Service; Overview of the Staff's Filing **Surrebuttal:** SWPA Payment, Ice Storm Amortization Rebasing, S02 Allowances, Fuel/Purchased Power and True-up
The Empire District Electric Company	ER-2010-0130	**Staff Report Cost of Service: Direct** Report on Cost of Service; Overview of the Staff's Filing; Regulatory Plan Amortizations; **Surrebuttal:** Regulatory Plan Amortizations
Missouri Gas Energy, a Division of Southern Union	GR-2009-0355	**Staff Report Cost of Service: Direct** Report on Cost of Service; Overview of the Staff's Filing; **Rebuttal:** Kansas Property Taxes/AAO; Bad Debts/Tracker; FAS 106/OPEBs; Policy; **Surrebuttal:** Environmental Expense, FAS 106/OPEBs
KCP&L Greater Missouri Operations Company	EO-2008-0216	**Rebuttal:** Accounting Authority Order Request
The Empire District Electric Company	ER-2008-0093	Case Overview; Regulatory Plan Amortizations; Asbury SCR; Commission Rules Tracker; Fuel Adjustment Clause; ROE and Risk; Depreciation; True-up; Gas Contract Unwinding
Missouri Gas Utility	GR-2008-0060	Report on Cost of Service; Overview of Staff's Filing

**CASE PARTICIPATION OF
MARK L. OLIGSCHLAEGER**

Company Name	Case Number	Issues
Laclede Gas Company	GR-2007-0208	Case Overview; Depreciation Expense/Depreciation Reserve; Affiliated Transactions; Regulatory Compact
Missouri Gas Energy	GR-2006-0422	Unrecovered Cost of Service Adjustment; Policy
The Empire District Electric Company	ER-2006-0315	Fuel/Purchased Power; Regulatory Plan Amortizations; Return on Equity; True-Up
Missouri Gas Energy	GR-2004-0209	Revenue Requirement Differences; Corporate Cost Allocation Study; Policy; Load Attrition; Capital Structure
Aquila, Inc., d/b/a Aquila Networks-MPS-Electric and Aquila Networks-L&P-Electric and Steam	ER-2004-0034 and HR-2004-0024 (Consolidated)	Aries Purchased Power Agreement; Merger Savings
Laclede Gas Company	GA-2002-429	Accounting Authority Order Request
Union Electric Company	EC-2002-1	Merger Savings; Criticisms of Staff's Case; Injuries and Damages; Uncollectibles
Missouri Public Service	ER-2001-672	Purchased Power Agreement; Merger Savings/Acquisition Adjustment
Gateway Pipeline Company	GM-2001-585	Financial Statements
Ozark Telephone Company	TC-2001-402	Interim Rate Refund
The Empire District Electric Company	ER-2001-299	Prudence/State Line Construction/Capital Costs
Missouri Gas Energy	GR-2001-292	SLRP Deferrals; Y2K Deferrals; Deferred Taxes; SLRP and Y2K CSE/GSIP
KLM Telephone Company	TT-2001-120	Policy
Holway Telephone Company	TT-2001-119	Policy
Peace Valley Telephone	TT-2001-118	Policy
Ozark Telephone Company	TT-2001-117	Policy
IAMO Telephone Company	TT-2001-116	Policy
Green Hills Telephone	TT-2001-115	Policy
UtiliCorp United & The Empire District Electric Company	EM-2000-369	Overall Recommendations

CASE PARTICIPATION OF
MARK L. OLIGSCHLAEGER

Company Name	Case Number	Issues
UtiliCorp United & St. Joseph Light & Power	EM-2000-292	Staff Overall Recommendations
Missouri-American Water	WM-2000-222	Conditions
Laclede Gas Company	GR-99-315 (remand)	Depreciation and Cost of Removal
United Water Missouri	WA-98-187	FAS 106 Deferrals
Western Resources & Kansas City Power & Light	EM-97-515	Regulatory Plan; Ratemaking Recommendations; Stranded Costs
Missouri Public Service	ER-97-394	Stranded/Transition Costs; Regulatory Asset Amortization; Performance Based Regulation
The Empire District Electric Company	ER-97-82	Policy
Missouri Gas Energy	GR-96-285	Riders; Savings Sharing
St. Louis County Water	WR-96-263	Future Plant
Union Electric Company	EM-96-149	Merger Savings; Transmission Policy
St. Louis County Water	WR-95-145	Policy
Western Resources & Southern Union Company	GM-94-40	Regulatory Asset Transfer
Generic Electric	EO-93-218	Preapproval
Generic Telephone	TO-92-306	Revenue Neutrality; Accounting Classification
Missouri Public Service	EO-91-358 and EO-91-360	Accounting Authority Order
Missouri-American Water Company	WR-91-211	True-up; Known and Measurable
Western Resources	GR-90-40 and GR-91-149	Take-Or-Pay Costs

CASE PARTICIPATION OF
MARK L. OLIGSCHLAEGER

COMPANY NAME	CASE NUMBER
Kansas City Power and Light Company	ER-82-66
Kansas City Power and Light Company	HR-82-67
Southwestern Bell Telephone Company	TR-82-199
Missouri Public Service Company	ER-83-40
Kansas City Power and Light Company	ER-83-49
Southwestern Bell Telephone Company	TR-83-253
Kansas City Power and Light Company	EO-84-4
Kansas City Power and Light Company	ER-85-128 & EO-85-185
KPL Gas Service Company	GR-86-76
Kansas City Power and Light Company	HO-86-139
Southwestern Bell Telephone Company	TC-89-14

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In The Matter of Petition of Missouri-American Water Company for Approval to Establish an Infrastructure System Replacement Surcharge (ISRS)	))))	**Case No. WO-2018-0373** Tariff No. YW-2019-0018

AFFIDAVIT OF MARK L. OLIGSCHLAEGER

State of Missouri)
) ss.
County of Cole)

COMES NOW Mark L. Oligschlaeger, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Direct Testimony*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Mark L. Oligschlaeger

Mark L. Oligschlaeger

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13th day of November, 2018.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070

D. Suzie Mankin

NOTARY PUBLIC