

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

In the Matter of The Empire District Electric Company's)
2013 Triennial Compliance Filing Pursuant to) File No. EO-2013-0547
4 CSR 240-22.)

JOINT FILING

Pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-22.080(9), The Empire District Electric Company (Empire), the Staff of the Commission (Staff), the Office of the Public Counsel (Public Counsel), the Department of Economic Development – Division of Energy (DED-DE)¹, Dogwood Energy, LLC (Dogwood)², (collectively, the Signatories), hereby submit this Joint Filing. This document contains an agreed-to remedy to various alleged deficiencies and concerns expressed by Staff, Public Counsel and DED-DE³ regarding Empire's triennial compliance filing, submitted on July 1, 2013. This document also identifies those alleged deficiencies and concerns that could not be resolved by the Signatories.

Earth Island Institute d/b/a Renew Missouri (Renew Missouri), Midwest Energy Users' Association (MEUA), and Missouri Joint Municipal Electric Utility Commission (MJMEUC) were also granted intervention in this matter. They do not join in this filing as signatories. However, counsel for Renew Missouri, MEUA and MJMEUC have indicated that they do not oppose this Joint Filing.

¹ The Missouri Department of Natural Resources (MDNR) was granted intervention in this case. DED-DE later indicated that it was the successor to MDNR.

² Dogwood joins this pleading for purposes of identifying unresolved matters in paragraphs 27-30 and does not join in either Empire's responses thereto or to any of the contents of paragraphs 4-26 or 31-32.

³ A portion of DED-DE's comments were provided by consultant GDS Associates, Inc. (GDS).

BACKGROUND

1. Pursuant to the Commission's Order Granting Waiver and Extension of Time in File No. EO-2013-0405, Empire submitted its triennial compliance filing (IRP) on July 1, 2013.

2. On November 27, 2013, Public Counsel filed its report containing alleged deficiencies. On December 2, 2013, DED-DE, Staff and Dogwood filed reports containing their alleged deficiencies and concerns. DED-DE also contracted with GDS Associates, Inc. (GDS) to identify possible deficiencies and concerns associated with Empire's IRP. No other reports were submitted.

3. The Commission's Electric Utility Resource Planning regulations provide that if the Staff, Public Counsel or any intervenor finds deficiencies in, or concerns with, a triennial compliance filing, they shall work with the electric utility and the other parties in an attempt to reach a joint agreement on a plan to remedy the identified deficiencies and concerns. This Joint Filing represents the result of those efforts in this matter, identifying a plan to remedy the alleged deficiencies and concerns where applicable and describing those areas on which agreement could not be reached as required by 4 CSR 240-22.080(9).

AGREED UPON PLAN TO REMEDY ALLEGED DEFICIENCIES AND CONCERNS

4 CSR 240-22.030 - Load Analysis and Load Forecasting

4. **Staff-Alleged Deficiency 2:** Empire did not develop its load forecasts at the major class level (defined as cost-of-service class of the utility in 4 CSR 240-22.010(37)) as required by 4 CSR 240-22.030(7)(A). Instead, Empire used customer classes at the revenue level.

Remedy: If Empire desires in the future to develop its load forecasts using classes other than the cost-of-service classes, then Empire will file an application for a variance from Commission Rule 4 CSR 240-22.030(7)(A).

5. **Staff-Alleged Concern B:** Empire agreed to provide full disclosure of its Chapter 22 load forecasting methodology in this IRP. However, this information was not provided as work papers with the Filing. This information was only provided as a response to a Data Request submitted by the Department of Economic Development Division of Energy.

Remedy: Empire will provide – in all future Chapter 22 filings – its load analysis and load forecasting methodology, including economic and forecasting models, as work papers, included in the normal distribution of case work papers.

6. **DED-DE/GDS-Alleged Deficiency 1:** Empire failed to fully address and document its analysis of the impact of existing DSM programs and DSM rates on its load forecast.

Remedy: While Empire does not necessarily agree that it is an IRP rule requirement to explicitly summarize the existing DSM, Empire will take this matter into consideration in preparation for its next triennial compliance filing after further discussions with interested stakeholders during the IRP planning process.

7. **DED-DE/GDS-Alleged Deficiency 2:** Empire's reporting of weather normalized summer and winter peak demands should reflect the normal peaking weather conditions for the season rather than for the month in which the peak occurs.

Remedy: While Empire does not agree that the reporting described by DED-DE/GDS is required by Commission rules, Empire will consider the use of seasonal peaks, rather than

monthly peaks, for its next triennial compliance filing after further discussions with interested stakeholders during the IRP planning process.

8. **DED-DE/GDS-Alleged Deficiency 3:** Empire’s forecast scenarios reflect too narrow a range of uncertainty regarding the economic series inputs.

Remedy: While Empire believes it followed the Commission rules and the input from interested members of the Advisory Group in regard to this subject, Empire will consider suggestions from stakeholders on methods to generate an appropriate range of forecasts for use in the next triennial compliance filing.

4 CSR 240-22.045 - Transmission and Distribution Analysis

9. **Staff-Alleged Deficiency 3:** Empire did not comply with requirements of 4 CSR 240 22.045(4)(C)1.A., since Empire has not yet performed a comprehensive analysis to optimize investments in advanced distribution technologies.

Remedy: Empire will perform a comprehensive analysis of advanced distribution technologies in its transmission and distribution analysis, in its analysis for special contemporary issues, in its 2015 annual update report, and in its next triennial compliance filing.

4 CSR 240-22.040 - Supply-Side Resource Analysis

10. **DED-DE Alleged Deficiency 1:** Empire realized “risk factors associated with Empire’s Missouri renewable energy standards (RES) compliance” due to some efforts over the past years to either modify certain provisions in the current RES law or propose a new RES law. However, the IRP does not sufficiently discuss compliance with the potentially modified or newly proposed RES.

Remedy: Empire has questioned whether failure to assess legislative proposals or past ballot initiatives constitutes a deficiency. DED-DE may propose this issue as a special contemporary issue for consideration by the Commission and potential analysis within that context.

11. **DED-DE Alleged Deficiency 2:** Empire examined a range of alternative and renewable generation options in its supply-side analysis. However, the treatment of those options, in particular, biomass, is very limited. The IRP lacked a detailed analysis to explore more usage of abundant biomass resources like agricultural wastes/residues and poultry waste in Empire's service territory.

Remedy: Empire will investigate indigenous wind resources in its service territory and the utilization of agricultural residues, poultry waste and landfill gas in greater detail and report the preliminary findings in the 2015 IRP annual update. Empire will conduct a detailed analysis of favorable indigenous renewable energy resources from the preliminary findings in the next triennial compliance filing.

12. **DED-DE Alleged Deficiency 3:** Empire lacked a detailed analysis of various distributed generation technologies, in particular combined heat and power (CHP), residential/commercial solar and small wind, in its screening analysis of potential supply-side resources.

Remedy: Empire addressed this topic as a special contemporary issue in the 2013 IRP and will address it again as a special contemporary issue for the 2014 Annual Update.

13. **DED-DE Alleged Deficiency 4:** Empire's existing power plant updates and committed resources include installation of new pollution control systems (scrubber, SCR, fabric filter and ACI) and conversion of Riverton Unit 12 from combustion turbine (CT) to combined

cycle (CC). However, Empire did not include an analysis of possible measures/updates to improve the plant energy efficiency.

Remedy: Empire will continue to explore generating plant efficiency improvements which reduce the utility's own use of energy for subsequent IRPs.

14. **DED-DE Alleged Concern 1:** EPA will issue proposed carbon pollution standards and guidelines for modified and existing power plants by June 2014. Empire only included a general discussion of greenhouse gas regulation in the IRP analysis. Empire should closely monitor EPA's upcoming rulemaking process on carbon regulation on existing power facilities and develop corresponding compliance plans in subsequent years.

Remedy: Empire will closely monitor rulemaking processes concerning carbon regulation on existing power facilities. Environmental issues were a critical uncertain factor in the triennial compliance filing and, thus, will also be reported on in the upcoming 2014 IRP annual update.

4 CSR 240-22.050 - Demand-Side Resource Analysis

15. **DED-DE/GDS-Alleged Deficiency 4:** In response to the rule requiring that its potential DSM programs provide coverage of all significant decision makers, Empire states that it meets regularly with an Advisory Group to review Empire's proposed demand side management programs, discuss opportunities for energy efficiency, and receive feedback. It is unclear how regular meetings with an Advisory Group satisfies the requirement that Empire identify a set of potential demand side resources that provide coverage of all significant decision makers including at least those who choose building design features and thermal integrity levels,

equipment and appliance efficiency levels, and utilization levels of the energy-using capital stock. (4 CSR 240-22.050(1)(B)(2))

Remedy: Empire will discuss with the stakeholders an appropriate method of identifying “all significant decision makers” for purposes of future IRP planning processes, and take into consideration in future filings, any clarification that can be provided as to the meaning of the phrase “Decision-Makers,” as it applies to the referenced rule.

16. **DED-DE/GDS-Alleged Deficiency 5:** While Empire’s proposed demand-side programs do address all major market segments, the AEG potential study which supported the development of Empire’s potential DSM programs does not broadly cover the full spectrum of end-use measures applicable to these market segments. (4 CSR 240-22.050(1))

Remedy: In the next triennial compliance filing Empire agrees to include a revised potential study and work with the Advisory Group on determining a more complete list of commercial available energy efficiency measures plus consider measures that may be reasonably anticipated to be available during the planning horizon.

17. **DED-DE/GDS-Alleged Deficiency 6:** GDS commends Empire on the completion of its baseline studies, but is concerned with the use of a 5 year old residential baseline study to inform the development of its DSM potential estimates. Specifically, GDS is concerned that while appliance saturations and demographics have not changed significantly as noted by Empire it does not follow therefore that the penetration of energy efficient equipment or the likelihood of a customer participating in an Empire program has not changed. (4 CSR 240-22.050(2) and (3))

Remedy: Empire will update the residential survey for its next triennial compliance filing.

18. **DED-DE/GDS-Alleged Deficiency 7:** On page 5-69 of its triennial compliance filing Empire states that in order to fulfill this requirement of the IRP rule, it analyzed the demand-side portfolios of six utilities. Empire further states that through this research, it discovered that the set of candidate DSM programs from this IRP does have many commonalities with those of the other utilities that were considered. GDS agrees that there are many commonalities, but there are also many differences. Empire provides no explanation of why programs being offered by other utilities that it identifies as not being offered or planned by Empire are not applicable for Empire. (4 CSR 240-22.050(3)(A))

Remedy: To fulfill this rule requirement Empire researched and reported on the demand-side portfolios of other utilities. After gleaning relevant information from other sources, the demand-side analysis in this IRP was conducted specifically for Empire and its particular service territory. Empire will expand upon the information in Table 5-31 and file it in this matter by March 3, 2014.

19. **DED-DE/GDS-Alleged Deficiency 8:** While Empire did identify major market segments in its IRP it did not provide any descriptions, identify decision-makers or describe primary market imperfections that are common to the members of the market segment as required by the rule. This information will help Empire design programs that better target decision makers and address market barriers. (4 CSR 240-22.050(3)(B))

Remedy: In its next triennial compliance filing, Empire will provide a description of each market including identification of decision makers and primary market imperfections common to members of the market. Empire will discuss this issue with stakeholders prior to that filing in order to better understand the concerns and potential methods to comply in the future.

20. **DED-DE/GDS-Alleged Deficiency 9:** Empire presents only a single paragraph in its IRP to support its conclusion regarding advanced metering and distribution technologies. Moreover, it presents an unsupported conclusion that current and future advanced technologies that can reasonably be anticipated to surface during the planning horizon are costly, and if utilized would have an impact on customer rates and could impact the cost effectiveness of the demand-side program. While this could be one possible outcome, Empire presents no research or analysis that describes and documents such a conclusion. (4 CSR 240-22.050(3)(D))

Remedy: In its next triennial compliance filing, Empire will provide a more extensive assessment of how advancements in metering and distribution technologies that may be reasonably anticipated to occur during the planning horizon will affect its ability to implement or deliver potential demand-side programs. Empire will discuss this issue with stakeholders prior to that filing in order to better understand the concerns and potential methods to available.

4 CSR 240-22.060 - Integrated Resource Analysis and Strategy Selection

21. **Staff-Alleged Deficiency 4:** Empire's resource acquisition strategy selection process is not compliant with Rules 4 CSR 240-22.070(1) and 4 CSR 240-22.010(2)(C), because Empire did not: a) explicitly identify and, where possible, quantitatively analyze considerations other than those which are critical to meeting the fundamental objective of the resource planning process; and b) describe and document the process used to select the preferred resource plan, including the relative weights given to the various performance measures and the rationale used by utility decision-makers to judge the appropriate tradeoffs between competing planning objectives and between expected performance and risk.

Remedy: Empire will: (1) describe and document the process used to explicitly identify, and where possible, quantitatively analyze any and all other considerations/constraints which are critical to meeting the fundamental objective of the resource planning process, but which may constrain or limit the minimization of the present worth of expected utility costs (PVRR) as the primary selection criterion when choosing its adopted preferred resource plan; and, (2) describe and document the process used to select the preferred resource plan, including the relative weights given to the various performance measures and the rationale used by utility decision-makers to judge the appropriate tradeoffs between competing planning objectives and between expected performance and risk. Should the Company not use minimization of the present worth of long-run utility costs as the primary selection criterion when choosing its adopted preferred resource plan, then Empire will utilize a decision scorecard with information and quantitative analysis contained in the Filing – and file it in this matter by February 18, 2014.

22. **Staff-Alleged Deficiency 5:** The Filing does not comply with Rule 4 CSR 240-22.070(2) concerning analysis and specification of ranges of critical uncertain factors for the adopted preferred resource plan.

Remedy: For its next triennial compliance filing, Empire will consider the methodologies employed by other Missouri electric investor-owned utilities to comply with 4 CSR 240-22.070(2). Further, Empire will discuss its approach to this issue with stakeholders prior to the next triennial compliance filing.

23. **Staff-Alleged Concern C:** Using Empire’s 2013 – 2015 RAP DSM programs measures and resulting energy and demand savings as the 3-year program plan in its MEEIA Application will result in inflated estimates of energy and demand savings in the MEEIA

Application, because this approach will not accurately account for the timing of changes in equipment, lighting and appliance standards.

Remedy: Empire has updated the preferred portfolio in the MEEIA filing (File No. EO-2014-0030) to attempt to address the described timing difference. Empire will incorporate the updated preferred DSM portfolio in its 2014 IRP annual update filing based on the most current information available at the time of that filing.

Linkage with MEEIA

24. **Staff-Alleged Deficiency 1:** Empire's adopted preferred resource plan – Plan 2 – is not consistent with Missouri's energy policy of achieving a goal of all cost-effective demand-side savings over the 20-year planning horizon as required by MEEIA and by the Commission's Chapter 22 Rules and MEEIA Rules.

Remedy: Empire has brought forward what it believes to be a cost-effective realistically achievable potential (RAP) 3-year demand-side portfolio from the 2013 IRP as part of its recent MEEIA filing (EO-2014-0030). Empire agrees that the 20-year estimate of its RAP portfolio reflects flat levels of incremental annual energy savings and incremental annual demand savings after 2017, even though the plan assumes the expenditure of about \$5 million each year through the end of the 20-year planning horizon. Empire agrees to work with its consultant(s) and stakeholder group in future IRP filings to identify alternative resource plans that may contain increasing levels of DSM savings.

25. **Public Counsel-Alleged Deficiency 3:** Failure to model increased levels of DSM (especially 2013) in a manner consistent with the timing of a MEEIA filing that would be needed to achieve the projected levels of DSM in the RAP, RAP+, and RAP++ DSM portfolios.

Empire's modeling of these portfolios had MEEIA-level DSM impacts beginning in early 2013 when, realistically, impacts at this level would occur sometime in the second half of 2014, at the earliest. This deficiency led to selection of a preferred plan that is not achievable and which will require major adjustments before it can be used as the basis for a three-year MEEIA filing.

Remedy: Empire will update the preferred portfolio in the MEEIA filing (File No. EO-2014-0030) for the timing difference described by Public Counsel. Empire will address MEEIA/DSM changes in its 2014 IRP update filing (based on the most current information available at the time). Also, Empire agrees that in its next triennial IRP filing, it will attempt to better reflect the timing of DSM program changes and load reduction impacts associated with those changes into the impact assumptions for future demand-side resources included in alternative resource plans. The timing of such impacts associated with DSM programs requiring additional approval in a future MEEIA application filed subsequent to the next triennial IRP filing will be based on reasonable assumptions regarding the length of time for: (1) the MEEIA program approval process and (2) the steps needed to plan and implement any new or substantially revised DSM programs.

26. **Staff-Alleged Concern A:** Staff believes Empire's 3-year implementation plan for demand-side resources in Plan 2 and its MEEIA Application is an unrealistic and unhealthy stretch for Empire during its very first MEEIA 3-year program plan.

Remedy: As agreed to in its previous IRP and MEEIA filings, Empire brought this DSM portfolio forward into a MEEIA filing (EO-2014-0030). The demand-side portfolio and the demand-side investment mechanism (DSIM) are being discussed in the MEEIA filing (EO-2014-0030). Empire will address any significant MEEIA DSM changes in its 2014 annual update filing, assuming such changes are available.

UNRESOLVED ALLEGED DEFICIENCIES AND CONCERNS

4 CSR 240-22.070 – Resource Acquisition Strategy Selection

27. **Dogwood Comment 1:** Empire failed to meet the rule by not using minimization of the present worth of long-run utility cost as the primary selection criterion in choosing the preferred resource plan, without identifying or quantifying any purported constraint. (See Report and Comments of Dogwood Energy, LLC.

Empire's Dispute: Empire asserts that it did use the minimization of PVRR as the primary criterion, while also considering legal mandates, energy policy, rate impacts, risk and uncertainty, resource diversity and reliability.

28. **Dogwood Comment 2:** Empire failed to meet the rule because it did not use competitive bidding to identify least-cost alternative supply-side resources. (See Report and Comments of Dogwood Energy, LLC.

Empire's Dispute: Empire believes that Chapter 22 of the Commission's rules does not require the use of competitive bidding to generate costs for supply-side resources. However, a competitive bidding process is used by Empire when aspects of the plan turn into actual projects.

29. **Dogwood Comment 3:** Specifically, Empire has included in its preferred plan the conversion of its Riverton Unit 12 combustion turbine to a combined cycle instead of the less-costly alternative of acquisition of a partial interest in the Dogwood combined cycle facility or other lower cost alternatives. (See Report and Comments of Dogwood Energy, LLC.

Empire's Dispute: Empire disagrees with Dogwood's allegation of which project was the least-costly alternative. Further, Empire believes the focus of the triennial compliance filing should be on the planning process itself, rather than on the particular plans or decisions that have resulted.

30. **Dogwood Comment 4:** Empire skewed previous studies in order to justify conversion of the Riverton Unit 12 facility when the estimated cost of the project was \$125,300,000, with highly questionable results. But the recently-disclosed increase of \$50,000,000 in Empire's cost estimate eliminates any arguable advantage to the conversion project relative to the Dogwood proposal and potentially other options as well. (See Report and Comments of Dogwood Energy, LLC.

Empire's Dispute: Empire disagrees with the factual allegations contained in this comment. Further, Empire believes the focus of the triennial compliance filing should be on the planning process itself, rather than on the particular plans or decisions that have resulted.

31. **Public Counsel-Alleged Deficiency 1:** 4 CSR 240-22.060 – Empire failed to create alternative resource plans that would fairly address the value of the RAP+ and RAP++ DSM portfolios. The large excess capacity balances for alternative resource plans 5 and 6 shown on pages 127 and 128 of Volume 6 indicate that Empire failed to optimize the supply-side portion of these plans by reducing the amount of supply-side resources in order to bring the excess capacity balance closer to zero in most years of the planning horizon. Supply-side resources could have been reduced by eliminating the 100 MWs of capacity that would be added by the proposed Riverton 12 combined cycle conversion in 2015 and/or by considering retirement of the Asbury 1 unit instead of adding costly environmental compliance controls to this generating unit. Empire asserts in its filing that these supply side resources are considered to be part of its “existing unit parameters for the 2013 IRP.” However, the treatment of these resources as “existing unit parameters” prevented Empire from fairly assessing the potential cost and risk reduction benefits of the RAP+ and RAP++ DSM portfolios.

Public Counsel Modification: Public Counsel has reduced the scope of the dispute associated with this alleged deficiency because it is no longer challenging Empire’s decision to include the Asbury 1 unit in the Company’s “existing unit parameters for the 2013 IRP.”

Empire’s Dispute: Empire asserts that it continues to monitor and review the Riverton 12 combined cycle conversion project. However, Empire believes that additional modeling within the triennial compliance filing is not efficient or necessary. The Riverton Unit 12 conversion project was considered a committed resource by Empire in the 2013 IRP, having been examined in prior proceedings and studies. A contract for the Riverton 12 project has been executed and engineering, procurement, and initial on-site construction activities for the project have begun. The Riverton 12 conversion is scheduled for completion in mid-2016 to coincide with the planned retirement of approximately 100 MW associated with Riverton units 7, 8 and 9.

32. **Public Counsel-Alleged Deficiency 2:** 4 CSR 240-22.010 (2)(A) – Empire failed to analyze demand-side resources, renewable energy, and supply side resources on an equivalent basis. The large excess capacity balances for alternative resource plans 5 and 6 shown on pages 127 and 128 of Volume 6 indicate that Empire failed to analyze demand-side resources, renewable energy, and supply side resources on an equivalent basis. This lack of equivalent analysis occurred because Empire failed to optimize the supply-side portion of these plans by reducing the amount of supply-side resources in order to bring the excess capacity balance closer to zero in most years of the planning horizon. Supply-side resources could have been reduced by eliminating the 100 MWs of capacity that would be added by the proposed Riverton 12 combined cycle conversion in 2015 and/or by considering retirement of the Asbury 1 unit instead of adding costly environmental compliance controls to this generating unit. Empire asserts in its

filing that these supply side resources are considered to be part of its “existing unit parameters for the 2013 IRP.” However, the treatment of these resources as “existing unit parameters” prevented Empire from fairly assessing the potential cost and risk reduction benefits of the RAP+ and RAP++ DSM portfolios.

Public Counsel Modification: Public Counsel has reduced the scope of the dispute associated with this alleged deficiency because it is no longer challenging Empire’s decision to include the Asbury 1 unit in the Company’s “existing unit parameters for the 2013 IRP.”

Empire’s Dispute: See Empire’s description of its dispute contained in paragraph 31 above.

WHEREFORE, the Signatories submit this Joint Filing for consideration by the Commission.

Respectfully submitted,

 <hr/> Dean L. Cooper MBE #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 voice (573) 635-3847 facsimile Email: dcooper@brydonlaw.com ATTORNEYS FOR THE EMPIRE DISTRICT ELECTRIC COMPANY	<hr/> //S// by dlc Nathan Williams Deputy Staff Counsel Missouri Bar No. 35512 ATTORNEY FOR THE STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION P. O. Box 360 Jefferson City, MO 65102 (573) 751-8702 (Telephone) (573) 751-9285 (Fax) nathan.williams@psc.mo.gov
<hr/> //S// by dlc Carl J. Lumley, Mo. Bar # 32869 Curtis, Heinz, Garrett & O’Keefe, P.C. 130 S. Bemiston, Suite 200 Clayton, MO 63105	<hr/> //S// by dlc Lewis R. Mills, Jr., Mo. Bar # 35275 Public Counsel P.O. Box 2230 Jefferson City, MO 65102-2230

314-725-8788 (Phone) 314-725-8789 (Fax) clumley@lawfirmemail.com ATTORNEYS FOR DOGWOOD ENERGY, LLC	573-751-1304 (Phone) 573-751-5562 (Fax) lewis.mills@ded.mo.gov OFFICE OF THE PUBLIC COUNSEL
____//S// by dlc____ Jeremy D. Knee Missouri Bar No. 64644 Assistant Attorney General P.O. Box 899 Jefferson City, Missouri 65102 Phone: 573-751-6579 Fax: 573-751-8796 Email: jeremy.knee@ago.mo.gov ATTORNEY FOR MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT – DIVISION OF ENERGY	

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on January 31, 2014, to the following:

Nathan Williams
Office of the Staff Counsel
nathan.williams@psc.mo.gov
staffcounsel@psc.mo.gov

Lewis Mills
Office of the Public Counsel
lewis.mills@ded.mo.gov
opc@ded.mo.gov

Jeremy Knee
Missouri Department of
Natural Resources
Jeremy.knee@ago.mo.gov

Carl Lumley
Curtis, Oetting, Heinz, Garrett & O'Keefe
clumley@lawfirmemail.com

Stuart Conrad
Finnegan, Conrad, et al.
stucon@fcplaw.com

Doug Healy
Healy & Healy, LLC
doug@healylawoffices.com

Andrew Linhares
Renew Missouri
Andrew@renewmo.org


