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Exhibit No.: Exhibit 304
Issue: *Tariff Rate*
Witness: *Matthew J. Barnes*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Direct Testimony*
Case No.: *WO-2020-0190*
Date Testimony Prepared: *May 22, 2020*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER AND SEWER DEPARTMENT

DIRECT TESTIMONY

OF

MATTHEW J. BARNES

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WO-2020-0190

Jefferson City, Missouri
May 2020

1 **DIRECT TESTIMONY**

2 **OF**

3 **MATTHEW J. BARNES**

4 **MISSOURI-AMERICAN WATER COMPANY**

5 **CASE NO. WO-2020-0190**

6 Q. Please state your name and business address.

7 A. My name is Matthew J. Barnes and my business address is Missouri Public
8 Service Commission, P.O. Box 360, Jefferson City, MO 65102.

9 Q. What is your position at the Missouri Public Service Commission
10 (Commission)?

11 A. I am a Utility Regulatory Auditor IV in the Industry Analysis Division, Water
12 and Sewer Department.

13 Q. What is your work and educational background?

14 A. Please see Schedule MJB-d1.

15 Q. Have you previously filed testimony before the Commission?

16 A. Yes. Please see Schedule MJB-d1.

17 Q. What is the purpose of your direct testimony?

18 A. The purpose of my testimony is to provide to the Commission Staff's proposed
19 ISRS rates for Missouri-American Water Company ("MAWC"). I will also provide the
20 Commission the difference between Staff's proposed ISRS rates and the ISRS rates without an
21 offset for a Net Operating Loss ("NOL"), as proposed by The Office of Public Council.

22 Q. What is ISRS?

1 A. ISRS stands for Infrastructure System Replacement Surcharge.

2 Q. Are there other Staff members filing testimony in this proceeding?

3 A. Yes. Staff expert Mark L. Oligschlaeger will be filing testimony
4 regarding Staff's inclusion of the NOL offset in Staff's recommended ISRS rates.
5 Staff expert Ali Arabian will be filing testimony regarding Staff's ISRS revenue requirement.

6 Q. What are Staff's proposed ISRS rates?

7 A. Based on Staff's ISRS revenue calculation supported by Mr. Arabian, Staff
8 proposes the Commission approve the following rates for each rate class per 1,000 gallons:

Proposed ISRS Rate Design Per 1,000 Gallons			
	<u>Current Rate</u>	<u>Adjustment to Current Rate</u>	<u>Proposed Rate Use on Tariff</u>
Rate Per 1000 Gal			
Rate A	\$ 0.66132	\$ 0.30155	\$ 0.96287
Rate B	\$ 0.01224	\$ 0.00239	\$ 0.01463
Rate J	\$ 0.01170	\$ 0.00229	\$ 0.01399

9
10 Q. Please briefly explain the various classes.

11 A. Rate A represents residential, commercial, and small industrial customers.
12 Rate B represents Sale for Resale customers. Rate J represents large industrial customers.

13 Q. How are rates determined for each class?

14 A. For each class, the cost of service allocation is based on the revenue requirement
15 being spread to each class based on billing determinants agreed to in the previous rate case.¹

16 Q. Did The Office of the Public Counsel ("Public Counsel") oppose Staff's
17 recommendation?

¹ Case No. WR-2017-0285.

1 A. Yes. Public Counsel opposes Staff's inclusion of a NOL offset amount of
2 approximately \$35,000² to cure potential normalization violations resulting from MAWC's last
3 three ISRS cases.

4 Q. Could you include a Table that shows a side-by-side comparison of ISRS rates
5 with and without an offset for a NOL amount?

6 A. Yes. Please see Table 1 below for a side-by-side comparison. Table 1 shows
7 the difference in rates with and without the NOL.

Rate Impact of NOL Offset (\$35,279) Per 1,000 Gallons			
	With NOL Offset	Without NOL Offset	Difference
Rate A	\$ 0.96287	\$ 0.96177	\$ 0.00110
Rate B	\$ 0.01463	\$ 0.01462	\$ 0.00001
Rate J	\$ 0.01399	\$ 0.01399	\$ -

8
9 Q. Do these rates only impact customers in the St. Louis County service area?

10 A. Yes. As per statute, the ISRS is only permitted in the St. Louis County
11 service area.

12 Q. Does this conclude your direct testimony?

13 A. Yes.

² Page 1 of *Response to Staff Recommendation and Request for an Evidentiary Hearing*, Paragraph 3, filed May 11, 2020.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Petition of Missouri-)
American Water Company for Approval to)
Change an Infrastructure System Replacement)
Surcharge (ISRS))
Case No. WO-2020-0190

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COME NOW Matthew J. Barnes and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

/s/ Matthew J. Barnes
Matthew J. Barnes

MATTHEW J. BARNES

EDUCATION AND RATE CASE PARTICIPATION

Educational and Employment Background and Credentials

I am a Utility Regulatory Auditor IV in the Water and Sewer Department, Commission Staff Division for the Missouri Public Service Commission. I was promoted to Utility Regulatory Auditor IV in the Energy Resources Department, Commission Staff Division for the Missouri Public Service Commission in June 2008. I accepted the position of Utility Regulatory Auditor I/II/III in June 2003. I transferred to the position of Utility Regulatory Auditor IV in the Water and Sewer Department in June 2016.

In December 2002, I earned a Bachelor of Science Degree in Business Administration with an Emphasis in Accounting from Columbia College. In May 2005, I earned a Masters in Business Administration with an Emphasis in Accounting from William Woods University.

RATE CASE PARTICIPATION

Date Filed	Issue	Case Number	Exhibit	Case Name
09/08/2004	Merger with TXU Gas	GM20040607	Staff Recommendation	Atmos Energy Corporation
10/15/2004	Rate of Return	TC20021076	Supplemental Direct	BPS Telephone Company
06/28/2005	Finance Recommendation	EF20050387	Staff Recommendation	Kansas City Power and Light Company
06/28/2005	Finance Recommendation	EF20050388	Staff Recommendation	Kansas City Power and Light Company
08/31/2005	Finance Recommendation	EF20050498	Staff Recommendation	Kansas City Power and Light Company
11/15/2005	Spin-off of landline operations	IO20060086	Rebuttal	Sprint Nextel Corporation

MATTHEW J. BARNES**EDUCATION AND RATE CASE PARTICIPATION**

Date Filed	Issue	Case Number	Exhibit	Case Name
03/08/2006	Spin-off of landline operations	TM20060272	Rebuttal	Alltel Missouri, Inc.
08/08/2006	Rate of Return	ER20060314	Direct	Kansas City Power & Light Company
09/08/2006	Rate of Return	ER20060314	Rebuttal	Kansas City Power & Light Company
09/13/2006	Rate of Return	GR20060387	Direct	Atmos Energy Corporation
10/06/2006	Rate of Return	ER20060314	Surrebuttal	Kansas City Power & Light Company
11/07/2006	Rate of Return	ER20060314	True-Up Direct	Kansas City Power & Light Company
11/13/2006	Rate of Return	GR20060387	Rebuttal	Atmos Energy Corporation
11/23/2006	Rate of Return	GR20060387	Surrebuttal	Atmos Energy Corporation
12/01/2006	Rate of Return	WR20060425	Direct	Algonquin Water Resources of Missouri LLC
12/28/2006	Rate of Return	WR20060425	Rebuttal	Algonquin Water Resources of Missouri LLC
01/12/2007	Rate of Return	WR20060425	Surrebuttal	Algonquin Water Resources of Missouri LLC
02/07/2007	Finance Recommendation	GF20070220	Staff Recommendation	Laclede Gas Company

MATTHEW J. BARNES

EDUCATION AND RATE CASE PARTICIPATION

Date Filed	Issue	Case Number	Exhibit	Case Name
05/04/2007	Rate of Return	GR20070208	Direct	Laclede Gas Company
07/24/2007	Rate of Return	ER20070291	Direct	Kansas City Power and Light Company
08/30/2007	Rate of Return	ER20070291	Rebuttal	Kansas City Power and Light Company
09/20/2007	Rate of Return	ER20070291	Surrebuttal	Kansas City Power and Light Company
11/02/2007	Rate of Return	ER20070291	True-up Direct	Kansas City Power and Light Company
02/01/2008	Finance Recommendation	EF20080214	Staff Recommendation	Kansas City Power and Light Company
02/22/2008	Rate of Return	ER20080093	Cost of Service Report	The Empire District Electric Company
04/04/2008	Rate of Return	ER20080093	Rebuttal Testimony	The Empire District Electric Company
04/25/2008	Rate of Return	ER20080093	Surrebuttal Testimony	The Empire District Electric Company
08/18/2008	Rate of Return	WR20080311	Cost of Service Report	Missouri-American Water Company
09/30/2008	Rate of Return	WR20080311	Rebuttal Testimony	Missouri-American Water Company

MATTHEW J. BARNES**EDUCATION AND RATE CASE PARTICIPATION**

Date Filed	Issue	Case Number	Exhibit	Case Name
10/16/2008	Rate of Return	WR2008031	Surrebuttal Testimony	Missouri-American Water Company
02/26/2010	Fuel Adjustment Clause	ER20100130	Cost of Service Report	The Empire District Electric Company
04/02/2010	Fuel Adjustment Clause	ER20100130	Rebuttal Testimony	The Empire District Electric Company
04/23/2010	Fuel Adjustment Clause	ER20100130	Surrebuttal Testimony	The Empire District Electric Company
02/23/11	Fuel Adjustment Clause	ER20110004	Cost of Service Report	The Empire District Electric Company
04/22/11	Fuel Adjustment Clause	ER20110004	Rebuttal Testimony	The Empire District Electric Company
04/28/11	Fuel Adjustment Clause	ER20110004	Surrebuttal Testimony	The Empire District Electric Company
05/06/11	Fuel Adjustment Clause	ER20110004	True-up Direct Testimony	The Empire District Electric Company
10/21/11	Costs for the Phase-In Tariffs	ER20120024	Direct Testimony	KCP&L Greater Missouri Operations Company
11/17/11	Rate of Return	WR20110337	Cost of Service Report	Missouri-American Water Company
08/09/12	Fuel Adjustment Clause	ER20120175	Staff Report	KCP&L Greater Missouri Operations Company
09/12/12	Fuel Adjustment Clause	ER20120175	Rebuttal Testimony	KCP&L Greater Missouri Operations Company

MATTHEW J. BARNES**EDUCATION AND RATE CASE PARTICIPATION**

Date Filed	Issue	Case Number	Exhibit	Case Name
10/10/12	Fuel Adjustment Clause	ER20120175	Surrebuttal Testimony	KCP&L Greater Missouri Operations Company
11/30/12	Fuel Adjustment Clause	ER20120345	Cost of Service Report	The Empire District Electric Company
12/13/14	Fuel Adjustment Clause	ER20120345	Class Cost of Service Report	The Empire District Electric Company
01/16/13	Fuel Adjustment Clause	ER20120345	Rebuttal Testimony	The Empire District Electric Company
02/14/13	Fuel Adjustment Clause	ER20120345	Surrebuttal Testimony	The Empire District Electric Company
12/05/14	Fuel Adjustment Clause	ER20140258	Cost of Service Report	Ameren Missouri
12/19/14	Fuel Adjustment Clause	ER20140258	Class Cost of Service Report	Ameren Missouri
01/16/15	Fuel Adjustment Clause	ER20140258	Rebuttal Testimony	Ameren Missouri
02/06/15	Fuel Adjustment Clause	ER20140258	Surrebuttal Testimony	Ameren Missouri
03/17/15	Fuel Adjustment Clause	ER20140258	True-up Direct Testimony	Ameren Missouri
07/15/16	Fuel Adjustment Clause	ER20160156	Staff Report Revenue Requirement Cost of Service	KCP&L Greater Missouri Operations Company

MATTHEW J. BARNES

EDUCATION AND RATE CASE PARTICIPATION

Date Filed	Issue	Case Number	Exhibit	Case Name
07/29/16	Fuel Adjustment Clause	ER20160156	Staff Report Rate Design	KCP&L Greater Missouri Operations Company
10/13/16	Rate of Return	SR20160202	Rebuttal Testimony	Raccoon Creek Utility Operating Company
10/13/17	Rate of Return	WR20170259	Direct Testimony	Indian Hills Utility Operating Company
12/13/17	Class Cost of Service/Rate Design	WR20170285	Staff's Class Cost of Service and Rate Design Report	Missouri American Water Company
01/24/18	Special Contracts	WR20170285	Rebuttal Testimony	Missouri American Water Company
02/09/18	Class Cost of Service/Rate Design	WR20170285	Surrebuttal Testimony	Missouri American Water Company
02/10/20	Rate Design	WR20200053	Staff Assisted Small Water and Sewer Case	Confluence Rivers Utility Operating Company, Inc.