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Witness: James A. Busch
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

WATER AND SEWER DEPARTMENT

SURREBUTTAL TESTIMONY

OF

JAMES A. BUSCH

**LIBERTY UTILITIES (MISSOURI WATER), LLC
D/B/A LIBERTY UTILITIES**

CASE NO. WR-2018-0170

*Jefferson City, Missouri
August 2018*

Exhibit No. 103
Date 8-16-18 *Reporter* TW
File No. WR-2018-0170

1
2
3
4
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6
7
8
9
10
11
12
13
14

**TABLE OF CONTENTS OF
SURREBUTTAL TESTIMONY
OF
JAMES A. BUSCH
LIBERTY UTILITIES (MISSOURI WATER), LLC
D/B/A LIBERTY UTILITIES
CASE NO. WR-2018-0170**

GENERAL COMMENTS ON STANNARD'S TESTIMONY 2
SILVERLEAF'S PHASE-IN RECOMMENDATION 3
STAFF'S FUTURE RATE CASE RECOMMENDATION..... 8
STAFF'S ALLEGED ERROR 14
SUMMARY 15

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **JAMES A. BUSCH**

4 **LIBERTY UTILITIES (MISSOURI WATER), LLC**
5 **D/B/A LIBERTY UTILITIES**

6 **CASE NO. WR-2018-0170**
7

8 Q. Please state your name and business address.

9 A. My name is James A. Busch and my business address is P.O. Box 360,
10 Jefferson City, Missouri 65102.

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

12 A. I am the Regulatory Manager of the Water and Sewer Department,
13 Commission Staff Division of the Missouri Public Service Commission ("Commission").

14 Q. Briefly describe your work experience and education.

15 A. I hold Bachelor of Science and Master of Science degrees in Economics from
16 Southern Illinois University at Edwardsville. From April 2005 through January 2008, I
17 worked as a Regulatory Economist III with the Energy Department of the Commission.
18 Previously, I worked as a Public Utility Economist with the Office of the Public Counsel
19 ("Public Counsel") from 1999 to 2005. Prior to my employment with Public Counsel, I
20 worked as a Regulatory Economist I with the Procurement Analysis Department of the
21 Commission from 1997 to 1999. I have been employed as the Regulatory Manager of the
22 Water and Sewer Department with the Staff of the Commission ("Staff") since February 2008.
23 In addition, I am a member of the Adjunct Faculty of Columbia College. I teach both
24 graduate and undergraduate classes in economics.

Surrebuttal Testimony of
James A. Busch

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

2 A. Yes. The cases in which I have filed testimony before the Commission are
3 listed on Schedule JAB-s1 attached to this testimony.

4 Q. What is the purpose of your Surrebuttal Testimony?

5 A. The purpose of my Surrebuttal Testimony is to respond to the testimony of
6 Silverleaf Resorts, Inc. and Orange Lake Country Club, Inc. witness William G. Stannard's
7 Rebuttal Testimony and to support the *Non-Unanimous Stipulation and Agreement*, filed
8 between Staff and Liberty.

9 **GENERAL COMMENTS ON STANNARD'S TESTIMONY**

10 Q. Is Staff clear on whose behalf Mr. Stannard provides testimony in this
11 proceeding?

12 A. No. In his Rebuttal Testimony, Mr. Stannard states that he has been retained
13 as an expert witness by Silverleaf Resorts, Inc. and Orange Lake Country Club, Inc.
14 ("Silverleaf").¹ However, later in his rebuttal, Mr. Stannard states, "[if] so, the existing
15 customers of Liberty Utilities would ask..."² In this statement, Mr. Stannard appears to be
16 speaking on behalf of all Liberty customers. Mr. Stannard has not indicated whether his
17 clients constitute a significant portion of the customers involved in this rate proceeding, or
18 merely one metered customer. Staff has filed Data Requests to determine this information.

19 Q. In Staff's opinion, does Mr. Stannard have a good understanding of the various
20 locations in which Liberty Utilities (Missouri Water), LLC d/b/a Liberty Utilities ("Liberty"
21 or "Company") has water and sewer operations?

¹ Stannard Rebuttal, page 1, lines 15 – 19.

² Stannard Rebuttal, page 6, lines 11 – 13.

Surrebuttal Testimony of
James A. Busch

1 A. No. On page 3 of Mr. Stannard's Rebuttal Testimony, he describes his
2 understanding of the water and sewer service provided by Liberty. Mr. Stannard indicates
3 that Liberty provides water and sewer service to Franklin, Jefferson, and Cape Girardeau
4 counties. Mr. Stannard omitted three counties where Liberty operates: two that Silverleaf has
5 properties in, Stone county (Ozark Mountain service area) and Taney county (Holiday Hills
6 service area), as well as McDonald county, where the Noel system is located.

7 Q. Silverleaf has properties in three distinct service areas, commonly referred to
8 as: Ozark Mountain, Holiday Hills, and Timber Creek. Do these three distinct service areas
9 have a common rate or does each service area have a distinct rate?

10 A. These three service areas, collectively known as Silverleaf (since Liberty
11 purchased the assets from Silverleaf Resorts, Inc.), have one common rate.

12 **SILVERLEAF'S PHASE-IN RECOMMENDATION**

13 Q. What is a phase-in rate design?

14 A. A phase-in rate design is an approach to rate design that allows for rates to be
15 increased on an incremental basis to reach the ultimate Commission approved revenue
16 requirement during some future period.

17 Q. What is Staff's general view on phasing in rates?

18 A. Staff does not generally oppose the use of phased-in rates in certain
19 circumstances.

20 Q. Under what circumstances would Staff be in favor of a phased-in rate design?

21 A. Staff reviews many factors when making its rate design recommendations and
22 views each situation independently. With that, Staff generally considers phase-ins when the

Surrebuttal Testimony of
James A. Busch

1 magnitude of the rate increase as compared to existing rates makes a slower approach to
2 increasing rates a better option for the customers.

3 Q. Is a phase-in being recommended in this proceeding?

4 A. Yes. Mr. Stannard is recommending a phase-in.

5 Q. Is the proposed phase-in by Mr. Stannard for all service areas served
6 by Liberty?

7 A. It appears that Mr. Stannard is recommending a phase-in solely for the
8 Silverleaf service areas.

9 Q. Is the phase-in for both the water and sewer rates of the Silverleaf
10 service areas?

11 A. Yes.

12 Q. Is the proposed increase to the Silverleaf service areas greater than the
13 proposed increase to the other service areas impacted by this rate case?

14 A. No. According to Staff's recommended revenue requirement, the increase for
15 these systems is on the lower end of the spectrum compared to the increase in the Noel and
16 KMB systems.

17 Q. Can you describe how Mr. Stannard's phase-in would work?

18 A. Yes. The phase-in would take the proposed increase (at the time of his
19 rebuttal, this percentage increase was roughly 76% for the water system) for the Silverleaf
20 service areas and spread it over five years. Each year for the first four years, both the
21 customer charge and the commodity rate will increase incrementally. In the first two years,
22 the percentage increase to the commodity rate and customer charge is 15% and 32%,
23 respectively, for a total increase by the second year of 53%. Since this means that the

Surrebuttal Testimony of
James A. Busch

1 increase is below the 76% increase recommended in this proceeding, the rates for the
2 Silverleaf systems will not cover its costs. For years 3 and 4, the percentage increases for
3 those two years are 27% and 24%, respectively. Then, for the fifth year, the rates would be
4 adjusted downward to the overall revenue requirement increase of 76%, to \$15.78, approved
5 by the Commission in this proceeding.

6 Q. Can you explain why the customer charge and commodity rate for years 3 and
7 4 are higher than the overall revenue requirement increase?

8 A. Yes. With a phase-in, the utility's rates are not designed to collect the
9 Commission approved revenue requirement during the initial years of the phase-in. In
10 Mr. Stannard's method, the under-collection in years one, two, and three, are deferred to the
11 following periods, causing those following periods' increases to be higher on a percentage
12 basis. Ultimately, under Mr. Stannard's plan, rates in years three and four will have to be
13 higher than they would have been if the entire revenue requirement was put into the initial
14 rates under a normal rate design.

15 Q. Since the utility will in effect be carrying the cost of the approved increase for
16 the customers during the initial years of the phase-in, would the future rate increases include
17 interest?

18 A. According to the testimony of Mr. Stannard, no.³ Mr. Stannard claims that
19 including carrying costs would not be appropriate in this case.

20 Q. Is Staff familiar with this type of phase-in approach?

21 A. No. Staff is not familiar with any type of phase-in that does not compensate
22 the utility for the cost of not receiving its full, Commission approved revenue requirement.

³ Stannard Rebuttal, page 27, lines 5 - 14.

Surrebuttal Testimony of
James A. Busch

1 Staff is also not familiar with a phase-in that would lead to rates that would result in increased
2 revenue requirement recovery, (excluding Commission approved carrying costs).

3 Q. What is Staff's recommendation regarding this unique phase-in proposal?

4 A. Staff recommends that the Commission deny the phase-in as proposed by
5 Mr. Stannard.

6 Q. Why does Staff disagree with Mr. Stannard's phase-in?

7 A. There are many reasons why Staff does not agree with the proposal.

8 First, in Staff's opinion, a phase-in is not appropriate in this proceeding. Staff does
9 not discount the impact of a potential 76% increase on rates and recognizes how this will
10 impact customers. However, Staff's updated proposed customer charge for water is \$26.84
11 and its proposed commodity rate is \$6.75. While higher than what these customers are used
12 to paying, these rates are not out of line with other small water utilities⁴. For the sewer rates,
13 the customer charge would be \$34.34 and the commodity rate would be \$25.58. The
14 commodity rate of \$25.58 would be the highest commodity rate for a regulated sewer utility
15 in Missouri, but the current commodity rate of \$17.24 is, right now, already the highest sewer
16 commodity rate in Missouri.

17 Second, Staff is very concerned about the rates proposed by Mr. Stannard in years
18 three and four of his phase-in. Reviewing Table 14 on page 26 of his Rebuttal Testimony, the
19 year three customer charge is \$17.46 and the commodity rate is \$11.61. For year four, the
20 respective rates are \$21.62 and \$14.38. Compared to the existing customer charge of \$8.96
21 and commodity rate of \$5.96, the proposed charges represent increases over current rates of
22 95% in year three and 141% in year four. Granted those increases are not yearly increases,

⁴ Please see Staff expert Matthew Barnes' Surrebuttal Testimony for a broader discussion of average rates.

Surrebuttal Testimony of
James A. Busch

1 but they do represent a significant increase in a short period of time. Further, Mr. Stannard's
2 reasoning for proposing a phase-in is to mitigate the rate shock of a proposed 76% rate
3 increase and rate stability. Customer charges increasing from \$8.96 to \$10.32 to \$13.71 to
4 \$17.46 to \$21.62 to \$15.78 over a five year period, coupled with commodity rates increasing
5 from \$5.96 to \$6.87 to \$9.12 to \$11.61 to \$14.38 over a five year period hardly seems like
6 rate stability. In fact, Mr. Stannard's proposed phase-in sends inconsistent price signals over
7 the five year period.

8 Third, Staff disagrees with the idea of limiting the phase-in to a subset of customers.
9 While Staff is a proponent of individual rates for each distinct service area (commonly
10 referred to as District Specific Pricing and described in more detail in Staff expert Matthew J.
11 Barnes' Direct Testimony), having one service area with phased-in rates seems to be an
12 inequitable manner of increasing rates. Further, since the utility will not be collecting its full
13 Commission approved revenue requirement under Mr. Stannard's proposal, due to certain
14 customers paying less, this could lead to lower customer service or maintenance in other
15 service areas due to financial pressures placed on the utility. Ultimately, the phase-in
16 Mr. Stannard has proposed treats one subset of customers with preferential treatment—
17 namely not covering that service area's cost of service—to the possible detriment of other
18 customers, without explanation for why those specific customers deserve special treatment.
19 Either a phase-in should be considered for all customers or none at all. In Staff's opinion,
20 Mr. Stannard's proposed phase-in should not be applied to the entire customer base, let alone
21 a special subset.

22 Fourth, Staff disagrees with the proposal not to include carrying costs. By not
23 including carrying costs, this proposed phase-in places an undue burden on the utility.

Surrebuttal Testimony of
James A. Busch

1 Q. On page 25, lines 16 – 17, Mr. Stannard states that customers should not be
2 penalized for Liberty’s failure to file for timely rate adjustments. In Staff’s opinion, are
3 customers being penalized?

4 A. No. Staff does not agree with the idea that customers are being penalized
5 because the utility waited nine years to file a rate case. Staff would suggest that although the
6 rate increase being proposed is high, the customers did have the advantage of paying lower
7 rates over the past few years rather than paying the higher rates sooner.

8 Q. How are customers advantaged by the longer wait between rate cases?

9 A. Customers are advantaged by paying a lower rate between actual rate cases
10 than they otherwise would have paid if Liberty had received a rate increase prior to this rate
11 case.

12 Q. Is Staff suggesting that utilities put off rate cases?

13 A. No. Staff highly recommends that utilities continually review their operations
14 and make all capital improvements in a timely manner and then request rate increases to cover
15 the increased investment and to adjust rates for increases in expenses.

16 **STAFF’S FUTURE RATE CASE RECOMMENDATION**

17 Q. Does Staff recommend that Liberty file a rate case in the near future?

18 A. Yes. In Staff expert Paul Harrison’s Direct Testimony, Staff recommends that
19 Liberty file a rate case 18 – 24 months after the effective date of this proceeding.⁵

20 Q. What is Mr. Stannard’s response to this recommendation?

21 A. Mr. Stannard expresses concerns with Staff’s recommendation.⁶

⁵ Harrison Direct, page 8, lines 9 – 18.

⁶ Stannard Rebuttal, page 5, lines 8-23 and page 6, lines 1-13.

Surrebuttal Testimony of
James A. Busch

1 Q. What is Mr. Stannard's concern?

2 A. In summary, Mr. Stannard does not believe that the customers in the existing
3 Liberty service areas should be subject to a rate increase request due solely to the acquisition
4 of Ozark International, Inc. ("Ozark") properties by Liberty.

5 Q. Has Liberty acquired the assets of Ozark?

6 A. Not at this time. Liberty has received Commission approval to purchase the
7 assets of the Ozark properties in Case No. WM-2018-0023. However, closing on the
8 proposed sale and transfer has yet to occur.

9 Q. Is the proposed acquisition the sole reason for Staff's recommendation?

10 A. As articulated in Staff expert Harrison's testimony, in Staff's opinion, both the
11 change in customer composition for Liberty due to the acquisition and Liberty's issues with
12 how it currently keeps its books and records are the two main reasons for Staff's
13 recommendation.

14 Q. What is Staff's basis for recommending that a utility come in for a rate case
15 18 – 24 months after it completes the acquisition of a new system?

16 A. Staff considers making this type of recommendation, or at least a rate review
17 recommendation, if the system is anticipated to have major capital improvements, materially
18 changes the composition of the acquiring utilities customer base, or may change the
19 operational characteristics of the acquired or acquiring utility.

20 Q. Mr. Stannard states on lines 14-17 on page 5, "[a]s a matter of fundamental
21 fairness, it makes no sense for customers on the Silverleaf Systems to be punished by
22 additional rate case costs and other substantial burdens based solely on Liberty Utilities

Surrebuttal Testimony of
James A. Busch

1 acquisition of an unrelated, non-contiguous system.” Are any existing customers, let alone
2 Silverleaf customers, being “punished” by additional rate case costs in a future rate case?

3 A. No. There are no customers being punished by this request. Rate case costs
4 are going to be included in this proceeding as a common expense payable by all customers.
5 A rate case in the future that would include Ozark’s additional 900 customers will allow for
6 rate case expense to be spread over a larger customer base. Additionally, a rate case in a
7 shorter period of time should allow the advantages built into the Staff Assisted Rate Case rule
8 to better limit rate case expense and thus have a smaller burden on all customers going
9 forward.

10 Q. In his statement above, Mr. Stannard further claims that there will be “other
11 substantial burdens.” Is Staff aware of other substantial burdens to be borne by Liberty’s
12 existing customers?

13 A. No, Staff is unaware of other substantial burdens. Furthermore, Mr. Stannard
14 offers no explanation or examples of what other burdens customers will incur, let alone how
15 they will be “substantial” burdens.

16 Q. On page 5, lines 19 – 23, and page 6, lines 1 - 2, Mr. Stannard opines that the
17 proposed acquisition of Ozark International does little or nothing to change the cost of service
18 to Silverleaf, except for a potential minimal shift in shared services expenses. Does Staff
19 agree with his opinion?

20 A. No. Staff does not agree with this opinion. Staff does agree that if all else is
21 held equal, meaning that Liberty experiences no change in operational costs or investment,
22 then, yes, the only real change to the cost of service for the Silverleaf properties would be the
23 sharing of corporate costs among an additional 900 customers. Currently, Liberty has

Surrebuttal Testimony of
James A. Busch

1 approximately 2,400 total customers. Adding 900 customers is an increase of over 37%. This
2 is a significant change to Liberty's operations. Further, if Liberty does not experience cost
3 increases or does not make additional capital investment at the Silverleaf properties, then
4 through depreciation, rate base will decrease which will also lower rates to Silverleaf
5 customers. It is Staff's experience that any reduction in cost of service that can be reflected in
6 rates is appreciated by all customers. Mr. Stannard does not address how adding 37% more
7 customers could potentially lower customers' bills and mitigate future rate increases.

8 Q. On page 6, lines 11 – 13, Mr. Stannard's makes the claim that "the existing
9 customers of Liberty would ask the Commission to consider this profoundly negative
10 impact in any future CCN applications for Liberty" (Emphasis added). Is Staff aware of any
11 "profoundly negative" impacts of CCN applications for Liberty?

12 A. No. Based on this comment, Staff questions Mr. Stannard's understanding of
13 the underlying water and sewer industries in Missouri and nationwide. Many small water and
14 sewer utilities, both privately and publicly owned, are struggling to maintain quality service
15 and/or meet current and future environmental requirements. The acquisition of these troubled
16 systems (either currently in trouble or potentially in trouble in the near future) has been
17 acknowledged by the Commission to be in the public interest.⁷ Furthermore, Staff has been
18 approached on occasion by the Missouri Department of Natural Resources to see if Staff was
19 aware of any capable utilities or other entities that were interested in purchasing these types of
20 systems.

⁷ Please see WA-2016-0019, *In the Matter of the Joint Application of Hickory Hills Water & Sewer Co., Inc. and Missouri-American Water Company, for MAWC to Acquire Certain Water and Sewer Assets of Hickory Hills and, in Connection Therewith, Issue Indebtedness and Encumber Assets.*
See also AX-2018-0240, *In the Matter of a Proposed Rule Regarding Incentives for Acquisition of Nonviable Utilities.*

Surrebuttal Testimony of
James A. Busch

1 Q. Also on page 6, lines 4 - 7, Mr. Stannard wonders how the proposed
2 acquisition of the Ozark properties is in the public interest at all. Is this the appropriate
3 setting for any party to question the appropriateness of the acquisition?

4 A. No. The time to question the proposed transfer was months ago during the
5 pendency of Case No. WM-2018-0023. Mr. Stannard's concerns seem to be too late. Also,
6 the appropriateness of the acquisition and/or its impact on rates is not being addressed in this
7 proceeding.

8 Q. The lateness and irrelevancy of Mr. Stannard's concerns aside, is the proposed
9 acquisition detrimental to the public interest?

10 A. Yes. In Case No. WM-2018-0023, the Commission issued an Order approving
11 the transfer and affirming that the transfer is not detrimental to the public interest.

12 Q. On page 6, Mr. Stannard offers a proposal which is solely driven by the
13 acquisition that would not include the Silverleaf customers in the recommended rate case.
14 Does Staff agree with this proposal?

15 A. Staff disagrees with this proposal. For a rate case to be effective, all relevant
16 factors need to be reviewed in order to set just and reasonable rates. One of the drivers behind
17 Staff's initial recommendation is that including 900 additional customers in Liberty's
18 portfolio, will spread corporate overhead costs to an even larger base, which will help lower
19 rates to those customers. If certain customers are excluded from the review, then those
20 allocations will not be recognized in rates for the excluded service area and the utility will
21 collect revenues in excess of those authorized by the Commission, something that
22 Mr. Stannard laments later in his testimony.

Surrebuttal Testimony of
James A. Busch

1 Also, as was pointed out earlier, another driver for the recommendation was the fact
2 that Liberty's books and records were not being kept in accordance with Commission rule.
3 As Liberty transitions to its new method of record keeping, a review in 18 – 24 months will
4 ensure that the books are being kept properly and rates going forward will be set accordingly.

5 Q. Finally, on page 8, lines 8 – 10, Mr. Stannard suggests that a distinct rate case
6 should be required solely for any future systems that Liberty might purchase. Does Staff
7 agree with this suggestion?

8 A. Staff does not agree with the concept of rate cases only for specific service
9 areas operated by a utility. As noted, a rate case should look at a utility's complete book and
10 records and consider all relevant factors. Limiting a review to one system will cause rate case
11 expense to be higher for all customers due to more rate cases for a utility and the potential for
12 the utility to over-collect due to corporate costs not being allocated to each service area
13 appropriately.

14 Q. Does Mr. Stannard have any other critiques regarding about Staff's rate case
15 recommendation?

16 A. Yes. On pages 5 – 8 of his Rebuttal Testimony, Mr. Stannard argues against
17 Staff's recommendation of a future rate case for Liberty to be filed in the next 18 – 24
18 months. In the alternative, he proposes that the Silverleaf systems be excluded from the
19 recommended future rate case, claiming the recommended future rate case is driven solely by
20 a proposed acquisition.⁸ However, on pages 25 and 26, lines 15 – 17 and 1 -2, Mr. Stannard,
21 in arguing for a phase-in (which will be discussed later in this testimony), states, "[t]he
22 decision to wait nine years before filing a rate case did not lie with those customers. It was

⁸ Stannard Rebuttal, page 6, lines 15 – 21.

1 the choice of Liberty Utilities. These customers should not be penalized for Liberty Utilities
2 failure to file for timely rate adjustments over the years....” Based on these two statements, it
3 is unclear as to how often Mr. Stannard would propose Liberty should file rate requests.

4 **STAFF’S ALLEGED ERROR**

5 Q. On page 10, lines 4 – 9, Mr. Stannard states that Staff and he have agreed that
6 Staff’s testimony overstated Liberty’s revenue requirement. Do you agree with
7 Mr. Stannard’s statement?

8 A. No. Staff does not agree that its testimony overstated revenue requirement.

9 Q. What is Mr. Stannard referring to when he alleged that Staff overstated its
10 revenue requirement recommendation?

11 A. Mr. Stannard is referring to a mistaken extrapolation that he conducted. This
12 made in response to Staff’s incorrect customer charge. As far as Staff can determine, the
13 issue, as noted by Mr. Stannard was that Staff’s rate design testimony had an error regarding
14 its recommended customer charge. Staff expert Barnes details the correction in his rebuttal
15 testimony. The issue was that Mr. Stannard took Staff’s incorrect customer charge for a
16 3/4 in. meter and extrapolated the additional customer charges for larger meter sizes (Staff did
17 not include those in its direct testimony). By doing this, Mr. Stannard calculated an additional
18 \$106,000 of revenue requirement. This additional amount was never Staff’s position on
19 revenue requirement. Mr. Stannard is correct that Staff was contacted about the mis-stated
20 customer charge and Staff immediately corrected the error, submitted corrected workpapers to
21 the parties, and updated its rate design proposal in its rebuttal testimony.

1 STAFF/LIBERTY NON-UNANIMOUS STIPULATION AND AGREEMENT

2 Q. Did Staff and Liberty file a *Non-Unanimous Stipulation and Agreement*?

3 A. Yes. Staff and Liberty filed a *Non-Unanimous Stipulation and Agreement*
4 ("Agreement") on Friday, August 3, 2018.

5 Q. Are you the Staff witness supporting the Agreement?

6 A. Yes. However, other Staff witnesses who have worked on specific issues may
7 also have knowledge on their specific issues.

8 SUMMARY

9 Q. Please summarize your surrebuttal.

10 A. Staff recommends the Commission deny Silverleaf's request for a phase-in rate
11 for the Silverleaf service areas. Based on the existing rate in the Silverleaf service areas, a
12 phase-in is not necessary to offset any potential rate shock. Staff also continues to
13 recommend that Liberty be required to file a rate case 18 – 24 months after the effective date
14 of the new rates in this proceeding. This rate case should encompass all of Liberty's service
15 areas. Staff also recommends that the Commission approve rates that are consistent with the
16 *Non-Unanimous Stipulation and Agreement*

17 Q. Does this conclude your surrebuttal testimony?

18 A. Yes.

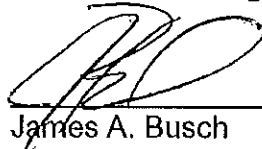
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of the Application of Rate Increase for)
Liberty Utilities (Missouri Water), LLC d/b/a)
Liberty Utilities)
Case No. WR-2018-0170

AFFIDAVIT OF JAMES A. BUSCH

State of Missouri)
) ss
County of Cole)


COMES NOW James A. Busch, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony*; and that the same is true and correct according to his best knowledge and belief. Further the Affiant sayeth not.



James A. Busch

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 30th day of July, 2018.



NOTARY PUBLIC

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 28, 2019 Commission Number: 15207377

**Cases of Filed Testimony
James A. Busch**

<u>Company</u>	<u>Case No.</u>
Union Electric Company	GR-97-393
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GO-98-484
Laclede Gas Company	GR-98-374
St. Joseph Light & Power	GR-99-246
Laclede Gas Company	GT-99-303
Laclede Gas Company	GR-99-315
Fiber Four Corporation	TA-2000-23; et al
Missouri-American Water Company	WR-2000-281/SR-2000-282
Union Electric Company d/b/a AmerenUE	GR-2000-512
St. Louis County Water	WR-2000-844
Empire District Electric Company	ER-2001-299
Missouri Gas Energy	GR-2001-292
Laclede Gas Company	GT-2001-329
Laclede Gas Company	GO-2000-394
Laclede Gas Company	GR-2001-629
UtiliCorp United, Inc.	ER-2001-672
Union Electric Company d/b/a AmerenUE	EC-2001-1
Laclede Gas Company	GR-2002-356
Empire District Electric Company	ER-2002-424
Southern Union Company	GM-2003-0238
Aquila, Inc.	EF-2003-0465
Missouri-American Water Company	WR-2003-0500
Union Electric Company d/b/a AmerenUE	GR-2003-0517
Aquila, Inc.	ER-2004-0034
Aquila, Inc.	GR-2004-0072
Missouri Gas Energy	GR-2004-0209
Empire District Electric Company	ER-2004-0570

**Cases of Filed Testimony
James A. Busch**

<u>Company</u>	<u>Case No.</u>
Aquila, Inc.	EO-2002-0384
Aquila, Inc.	ER-2005-0436
Empire District Electric Company	ER-2006-0315
Kansas City Power & Light	ER-2006-0314
Union Electric Company d/b/a AmerenUE	ER-2007-0002
Aquila, Inc.	EO-2007-0395
Missouri-American Water Company (Live)	WC-2009-0277
Missouri-American Water Company	WR-2010-0131
Review of Economic, Legal and Policy Considerations Of District Specific Pricing and Single Tariff Pricing (Live)	SW-2011-0103
Timber Creek Sewer Company	SR-2011-0320
Missouri-American Water Company	WR-2011-0337
Emerald Pointe Utility Company	SR-2013-0016
City of Pevely and CPWSD C-1 of Jefferson County	WC-2014-0018
Hickory Hills Water and Sewer Company, Inc.	SR-2014-0166/WR-2014-0167
Peaceful Valley Service Company (Live)	SR-2014-0153/WR-2014-0154
Central Rivers Wastewater Utility	SR-2014-0247
Missouri-American Water Company	WR-2015-0301
Ridge Creek Water, LLC	WO-2017-0236
Missouri-American Water Company	WO-2018-0059
Missouri-American Water Company	WR-2017-0285
Liberty Utilities (Missouri Water)LLC and Ozark	WM-2018-0023