

Exhibit No.: 326
Issue: Fire Safety and Suppression
Witness: Matthew D. Schofield
Sponsoring Party: City of Jefferson City, Missouri
Case No.: Case No. WR-2017-0285

CITY OF JEFFERSON CITY, MISSOURI

Case No. WR-2017-0285

SURREBUTTAL TESTIMONY

OF

MATTHEW D. SCHOFIELD

Jefferson City, Missouri
February 2018

City of Jeff City Exhibit No. 326
Date 3-5-18 Reporter Becca T.
File No. WR-2017-0285

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company's)
Request for Authority to Implement a General Rate) Case No. WR-2017-0285, et al.
Increase for Water and Sewer Service Provided in)
Missouri Service Areas)

AFFIDAVIT OF MATTHEW D. SCHOFIELD

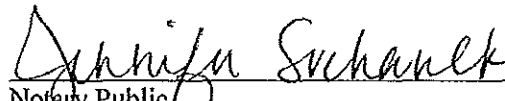
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Matthew D. Schofield, of lawful age, and being duly sworn, do hereby depose and state:

1. My name is Matthew D. Schofield. I am presently Fire Chief for the Jefferson City Fire Department for the City of Jefferson, intervener in the referenced matter.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

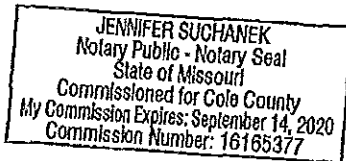

Matthew D. Schofield

Subscribed and sworn to before me, a Notary Public, this 2nd day of February, 2018.


Notary Public

My Commission expires:

September 14, 2020



SURREBUTTAL TESTIMONY
MATTHEW D. SCHOFIELD

1

2 Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.

3 A. My name is Matthew D. Schofield, and I am the Fire Chief for the Jefferson City Fire
4 Department. My business address is 305 E. Miller Street, Jefferson City, Missouri.

5 Q. ARE YOU THE SAME MATTHEW D. SCHOFIELD WHO FILED DIRECT
6 TESTIMONY ON BEHALF OF THE CITY OF JEFFERSON IN THIS PROCEEDING?

7 A. Yes, I am.

8 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

9 A. I will be responding to portions of the rebuttal testimony of Bruce W. Aiton, the Director
10 of Engineering for Missouri American Water Company.

11 Q. AT PAGES 8- 9 OF HIS TESTIMONY MR. AITON TESTIFIES THAT “[W]HEN THE
12 COMPANY PRIORITIZES ITS MAIN REPLACEMENT PROJECTS, IT CONSIDERS,
13 AMONG OTHER FACTORS, THE UPSIZING OF THOSE MAINS THAT ARE
14 CONNECTED TO FIRE HYDRANTS, WHICH CURRENTLY MAKES UP ABOUT
15 1.2% OF ALL MAINS IN THE JEFFERSON CITY WATER SYSTEM.” ARE YOU IN
16 AGREEMENT WITH MR. AITON’S FIGURE ON THE PERCENTAGE OF
17 UNDERSIZED MAINS CONNECTED TO FIRE HYDRANTS IN JEFFERSON CITY?

18 A. I have no information of my own to either confirm or disaffirm Mr. Aiton’s percentage
19 figure and I will accept it as accurate. Yet, with only 1.2% of undersized mains
20 connected to fire hydrants remaining in the city, I strongly suggest that their
21 replacement/upsizing become a Company priority. The Company should commit the

1 needed resources to replace/upsized this relatively small portion of their system in the near
2 term. One would presume these same small diameter lines would also be some of the
3 older mains in the system, nearing the end of their service life.

4 Q. ALSO ON PAGE 9 OF HIS TESTIMONY, WITH RESPECT TO YOUR
5 DESCRIPTION OF WATER PRESSURE CONCERNS AT THE JEFFERSON CITY
6 AIRPORT, MR. AITON TESTIFIES THAT A PRESSURE REDUCING VALVE
7 ("PRV") LOCATED NEAR THE WHOLESALE WATER SUPPLY POINT FOR THE
8 AREA MAY BE CONTRIBUTING TO THE PRESSURE ISSUE AND THE
9 COMPANY HAS SCHEDULED ITS REPLACEMENT SOMETIME THIS SPRING.
10 WILL A REPLACEMENT OF THE PRV CORRECT THE PRESSURE PROBLEM AT
11 THE AIRPORT?

12 A. The replacement of the PRV is certainly a good start to resolving the problem, and my
13 department looks forward to working with the Company to make any needed upgrades to
14 commercial and residential fire flows in the area. Specifically, my department will work
15 with the Company in establishing estimations of needed fire flow (NFF) taking into
16 account both the pressure and volume of water required to address fire suppression needs
17 of existing infrastructure in the area.

18 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

19 A. Yes.