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Service Commission

Exhibit No.:
Issue(s): Policy
Witness: Natelle Dietrich
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: WA-2019-0185
Date Testimony Prepared: September 4, 2019

MISSOURI PUBLIC SERVICE COMMISSION
COMMISSION STAFF DIVISION

SURREBUTTAL TESTIMONY
OF
NATELLE DIETRICH

OSAGE UTILITY OPERATING CO., INC.

CASE NO. WA-2019-0185

Staff Exhibit No. 101
Date 9-17-19 Reporter BJB
File No. WA-2019-0185

Jefferson City, Missouri
September 2019

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **NATELLE DIETRICH**

4 **OSAGE UTILITY OPERATING CO., INC.**

5 **CASE NO. WA-2019-0185**

6 Q. Please state your name and business address.

7 A. My name is Natelle Dietrich. My business address is 200 Madison Street,
8 Jefferson City, Missouri 65101.

9 Q. Are you the same Natelle Dietrich that previously filed Direct Testimony in this
10 case on July 11, 2019?

11 A. Yes I am.

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

13 A. The purpose of my Surrebuttal Testimony is to respond to the Rebuttal
14 Testimony of Anthony J. Soukenik filed on August 13, 2019, on behalf of Reflections
15 Subdivision Master Association, Inc. (“Reflections”). More specifically, at page 3, lines 3
16 through 11, Mr. Soukenik indicates that on August 2, 2019, a notice (attached as Exhibit AJS 1-
17 A to Mr. Soukenik’s testimony) was issued to Central States Water Resources, Inc. (“CSWR”),¹
18 terminating the Amended Agreement between CSWR and Reflections.

19 Q. Does this statement change Staff’s recommendation in this case?

20 A. No. At this time, CSWR, or more appropriately, Osage Utility Operating Co.,
21 Inc. (“OUOC”) has not withdrawn Reflections from its Application. It is Staff’s understanding

¹ Osage Utility Operating Co., Inc. is an affiliate of Central States Water Resources, Inc.

1 that the notice of termination is subject to litigation in Camden County, Missouri, wherein
2 CSWR alleges Reflections “failed to act promptly or in a reasonable time” to terminate the
3 Agreement.² Depending on the status of the litigation at the time of the hearing, Staff may have
4 a revised position on the Reflections portion of the Application. At any rate, Staff does not
5 recommend the Commission delay granting CCNs to OUOC for the remainder of the
6 Application subject to the applicable conditions outlined in Staff’s Memorandum attached as
7 Schedule ND-d2 to my Direct Testimony. As for the Reflections CCN, depending on the status
8 of the litigation and the Application at the time of the Commission decision, the Commission
9 could make the CCN conditioned upon closing of the Reflections/OUOC transaction.

10 Q. Confidential Schedule ND-d2 includes a list of several Staff witnesses that
11 contributed to the Memorandum. Are other Staff witnesses filing Surrebuttal Testimony in
12 this case?

13 A. Yes. Staff witness Kim Bolin, who contributed to the Rate Base and Request
14 for Acquisition Incentives portions of Staff’s Memorandum, is filing Surrebuttal Testimony
15 related to the acquisition incentive in response to the Office of the Public Counsel’s witness
16 Keri Roth. Staff witness Scott Glasgow, who contributed to the Customer Experience
17 Department’s portion of Staff’s Memorandum, is filing Surrebuttal Testimony in response to
18 customer notice issues raised by Ms. Roth. David Roos, who contributed to the Water and
19 Sewer analyses portions of Staff’s Memorandum is filing Surrebuttal Testimony in response to
20 Public Water Supply District No. 5 of Camden County, Missouri witness David Krehbiel.

² *Petition for Injunction & Declaratory Relief*, Central States Water Resources, Inc. Plaintiff, v. Great Southern Bank, Reflections Subdivision Master Association, Inc., and Reflections Condominium Owners Association, Inc., Defendants. 19CM-CC00158. August 15, 2019.

Surrebuttal Testimony of
Natelle Dietrich

1 With the exception of Staff member David Buttig, who prepared the Depreciation section of
2 the Memorandum, all other Staff members listed on the Memorandum provided information
3 or support to the Memorandum but are not sponsoring contributors to the writing of
4 the Memorandum.

5 Q. Does this conclude your Surrebuttal Testimony?

6 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Osage)	
Utility Operating Company, Inc. to Acquire)	Case No. WA-2019-0185
Certain Water and Sewer Assets and for a)	
Certificate of Convenience and Necessity)	

AFFIDAVIT OF NATELLE DIETRICH

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW NATELLE DIETRICH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Natelle Dietrich
NATELLE DIETRICH

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 4th day of September 2019.

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