

*Exhibit No.:*  
*Issues:* *Unaccounted for  
Water / Main Breaks*  
*Witness:* *Andrew Harris*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Rebuttal Testimony*  
*Case No.:* *WR-2020-0344*  
*Date Testimony Prepared:* *February 9, 2021*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**WATER AND SEWER DEPARTMENT**

**SURREBUTTAL TESTIMONY**

**OF**

**ANDREW HARRIS**

**MISSOURI-AMERICAN WATER COMPANY**

**CASE NO. WR-2020-0344**

*Jefferson City, Missouri*  
*February 2021*

**SURREBUTTAL TESTIMONY OF**  
**ANDREW HARRIS**  
**MISSOURI-AMERICAN WATER COMPANY**  
**CASE NO. WR-2020-0344**

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3  
4  
5 Q. Please state your name and business address.

6 A. My name is Andrew Harris. My business address is 200 Madison Street,  
7 Jefferson City, Missouri, 65101.

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

9 A. I am employed by the Missouri Public Service Commission (“Commission”) as  
10 a Senior Professional Engineer.

11 Q. Please describe your educational experience, work experience, and any cases in  
12 which you have previously filed testimony before this Commission.

13 A. I have not previously filed testimony before this Commission. My credentials  
14 and a list of cases in which I have participated are attached as Schedule AH-s1.

15 Q. What is the purpose of your surrebuttal testimony?

16 A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony  
17 of Missouri Industrial Energy Consumers (“MIEC”) witness Greg R. Meyer.

18 Q. To what in the rebuttal testimony of Mr. Meyer are you responding?

19 A. On page 11, line 14, Mr. Meyer proposes that, going forward,  
20 Missouri-American Water Company (“MAWC”) submit an annual report by major service area  
21 that details main breaks and lost and unaccounted for water by major service area.

22 Q. Do you support Mr. Meyer’s proposal for the preparation of an annual report  
23 that accounts for main breaks and unaccounted for water by major service area?

Surrebuttal Testimony of  
Andrew L. Harris

1           A.     Generally, I do. This information would be useful when evaluating distribution  
2 system capital expenditure planning.

3           Q.     Does Mr. Meyer make further reporting proposals?

4           A.     Yes. On page 12, lines 6 through 8, Mr. Meyer further requests that MAWC  
5 provide detailed explanations in the annual report if unaccounted for water loss percentage  
6 exceeded 20% on an annual basis for any of the major service territories.

7           Q.     Do you support this request for detailed explanations in the annual report?

8           A.     Yes. However, the request could include an additional measure. For systems  
9 with higher potential for significant loss control realization, a more comprehensive water audit  
10 of these systems would provide interested parties more useful data. The water audit process is  
11 performed to develop a system water balance, which is a quantification of all system flows, in  
12 order to identify where losses occur, to plan, prioritize, and implement corrective actions, and  
13 to evaluate the impact of actions taken. While water audits would not occur on an annual basis,  
14 as would the detailed explanation in an annual report, the water audit would provide the data  
15 that the initial detailed explanation of these higher loss systems is based on.

16          Q.     Does this conclude your surrebuttal testimony?

17          A.     Yes it does.

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

In the Matter of Missouri-American Water     )  
Company's Request for Authority to     )     Case No. WR-2020-0344  
Implement General Rate Increase for     )  
Water and Sewer Service Provided in     )  
Missouri Service Areas     )

**AFFIDAVIT OF ANDREW HARRIS**

STATE OF MISSOURI     )  
  )     ss.  
COUNTY OF COLE     )

**COME NOW ANDREW HARRIS** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Andrew Harris*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

*/s/ Andrew Harris*  
\_\_\_\_\_ )  
**ANDREW HARRIS**

**ANDREW HARRIS**

**CREDENTIALS AND RATE CASE PARTICIPATION**

I am employed by the Missouri Public Service Commission as a Senior Professional Engineer, in the Water and Sewer Department. My duties include the review, inspection, and investigation of water and sewer systems and the development and preparation of recommendations regarding those systems. Specifically included are technical issues associated with water and sewer utility rate and acquisition cases including quality of service matters, utility plant utilization, costs incurred for providing utility service, and tariff rules. In addition to formal case work, I handle informal customer complaints that are of a technical nature, and informally assist water and sewer utility companies with respect to day-to-day operations, planning, and customer service issues.

**Educational Background and Work Experience**

I graduated from University of Missouri – Rolla in 1997 with a Bachelor of Science degree in Chemical Engineering. I am a Registered Professional Engineer in the State of Missouri and have been continuously licensed in Missouri since 2003. Previous employment includes experience in both operations and engineering with municipal, industrial, and consulting organizations. I hold certificates of competency at the highest level available from Missouri Department of Natural Resources for water and wastewater treatment as well as distribution system operations.

**Case Participation**

<b><u>Company</u></b>	<b><u>Case No.</u></b>
Missouri American Water Company (MAWC)	SA-2019-0334
Timber Creek	SA-2020-0013
Liberty Utilities	SA-2020-0067
MAWC	SA-2020-0132
Elm Hills	SA-2020-0152
Liberty Utilities	SA-2020-0216
Liberty Utilities	SA-2020-0398
MAWC	SA-2021-0017
MAWC	SA-2021-0074
Elm Hills	SM-2020-0146
MAWC	SR-2020-0345
MAWC	WA-2019-0259
Liberty Utilities	WM-2020-0156
Raytown Water Company	WR-2020-0264
MAWC	WT-2020-0353