

**Exhibit No.:** \_\_\_\_\_  
**Issue(s):** Cost Recovery Mechanism and  
ISRS  
**Witness/Type of Exhibit:** Robinett/Direct  
**Sponsoring Party:** Public Counsel  
**Case Nos.:** GO-2018-0309 & GO-2018-0310

**DIRECT TESTIMONY**

**OF**

**JOHN A. ROBINETT**

Submitted on Behalf of the Office of the Public Counsel

**SPIRE MISSOURI EAST  
SPIRE MISSOURI WEST**

CASE NOS. GO-2018-0309 & GO-2018-0310

May 13, 2020

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

In the Matter of the Application of )  
Spire Missouri Inc. to Establish an )  
Infrastructure System Replacement )  
Surcharge in its Spire Missouri East )  
Service Territory )

File No. GO-2018-0309

In the Matter of the Application of )  
Spire Missouri Inc. to Establish an )  
Infrastructure System Replacement )  
Surcharge in its Spire Missouri West )  
Service Territory )

File No. GO-2018-0310

**VERIFICATION OF JOHN A. ROBINETT**

John A. Robinett, under penalty of perjury, states:

1. Attached hereto and made a part hereof for all purposes is my direct testimony in the above-captioned case.

3. My answer to each question in the attached direct testimony is true and correct to the best of my knowledge, information, and belief.



John A. Robinett

Utility Engineering Specialist

Office of the Public Counsel

**DIRECT TESTIMONY RESPONDING TO REMAND  
OF  
JOHN A. ROBINETT  
SPIRE MISSOURI EAST  
SPIRE MISSOURI WEST**

**CASE Nos. GO-2018-0309**

**GO-2018-0310**

1 **Q. Are you the same John A. Robinett who filed direct testimony and live rebuttal on behalf**  
2 **of the Missouri Office of the Public Counsel (“OPC”) at the evidentiary hearing held on**  
3 **September 27, 2018, in this proceeding?**

4 A. Yes. I am.

5 **Q. How should the Commission calculate the dollar value related to the remand to**  
6 **refund customers?**

7 A. First I would request that the calculation be performed by the “only independent/neutral  
8 party” in the case. I would therefore request that the Commission order its Staff to perform  
9 the calculations first by using substantially the same method applied in the previous and  
10 subsequent two Spire ISRS cases regarding the disallowance of plastic. However, an  
11 additional method could be a re-review of the work order authorization sheets for each  
12 project. Under the work order authorization method, OPC would be supportive of  
13 continued recovery on any work order authorization sheet that specifically stated corrosion,  
14 leak repair, main relocation, main re-lining, and joint encapsulation projects. All work  
15 order authorization sheets that do not point to one of these issues would be subject to refund  
16 as not being proven to be worn out or in a deteriorated condition and not eligible for  
17 continued ISRS recovery.

1 **Q. Were you able to perform analysis to reach a dollar value for the revenue requirement**  
2 **related to the remand?**

3 A. No. I was unable to perform analysis to obtain revenue requirement values related to the  
4 remand due to time and resource constraints caused by the ongoing Empire Electric general  
5 rate case (ER-2019-0374) for which I have also supplied testimony.

6 **Q. Does this conclude your direct testimony on remand?**

7 A. Yes, it does.