

Exhibit No.:  
Issues: Certificate Application  
Witness: Martin Hummel  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Cross-Surrebuttal Testimony  
Case No.: SA-2010-0063  
Date Testimony Prepared: April 2, 2010

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**CROSS-SURREBUTTAL TESTIMONY**

**OF**

**MARTIN HUMMEL**

**TIMBER CREEK SEWER COMPANY**

**CASE NO. SA-2010-0063**

**Jefferson City, Missouri  
April 2010**

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

In the Matter of the Application of Timber )  
Creek Sewer Company for a Certificate of )  
Convenience and Necessity )

Case No. SA-2010-0063

**AFFIDAVIT OF MARTIN HUMMEL**

STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

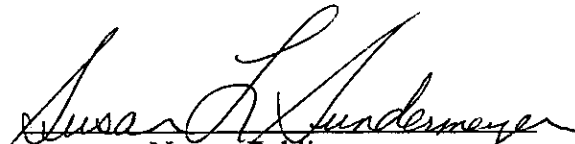
Martin Hummel, of lawful age, on his oath states: that he has participated in the preparation of the following Cross-Surrebuttal Testimony in question and answer form, consisting of 3 pages of Cross-Surrebuttal Testimony to be presented in the above case, that the answers in the following Cross-Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
Martin Hummel

Subscribed and sworn to before me this 2nd day of April, 2010.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942086

  
Notary Public

1 **CROSS-SURREBUTTAL TESTIMONY**  
2  
3 **OF**  
4  
5 **MARTIN HUMMEL**  
6  
7 **TIMBER CREEK SEWER COMPANY**  
8  
9 **CASE NO. SA-2010-0063**  
10

11  
12 **Q. Please state your name and business mailing address?**

13 A. Martin Hummel, P.O. Box 360, Jefferson City, MO 65102.

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

15 A. I am employed by the Missouri Public Service Commission (Commission)  
16 as a Utility Engineering Specialist III in the Water & Sewer Department (W/S Dept) of  
17 the Utility Operations Division.

18 **Q. Are you the same Martin Hummel who previously filed Rebuttal**  
19 **testimony in this case?**

20 A. Yes.

21 **Q. On Page 2, line 6, of Mr. Kalis's Surrebuttal Testimony for Platte**  
22 **County Regional Sewer District (PCRSB), Mr. Kalis claims that Timber Creek's**  
23 **"small treatment plant" is not expected to provide long term needs? Do you agree**  
24 **with his statement?**

25 A. Timber Creek Sewer's (TCS) "small treatment plant" is not expected to  
26 provide long term needs. However, the treatment plant currently in place has the  
27 immediate capacity to serve the customers that need service today, rather than wait until  
28 long term capacity is available.

1           The treatment capacity at the Platte City Wastewater Treatment Facility is likely  
2 available to whomever can develop the capability to pump the wastewater to that plant.  
3 Such capability is not a minor undertaking and may well involve boring under the  
4 interstate highway, which neither PCRSD nor TCS have confirmed the plausibility or the  
5 feasibility of carrying out.

6           **Q.     On Page 3, line 1, of Kalis's Surrebuttal, Mr. Kalis states that "This**  
7 **[PCRSD transporting sewage for treatment at the Platte City treatment facility]**  
8 **would provide a more economical solution than that proposed by Timber Creek...."**  
9 **Please comment.**

10          A.     Neither party has taken the planning to the point of being able to specify  
11 what facilities should be constructed to serve the proposed service area or to be able to  
12 conclude what combination of facilities "would provide a more economical solution". It  
13 can not be assumed that building lift stations, boring under the interstate highway, and  
14 incurring the associated pumping costs is a "more economical solution". Planning that  
15 determines feasibility and a solid estimate of the alternatives is still needed. The Master  
16 Plan states (Note 2, p6-14 and p6-15): "Costs shown are conceptual in nature..., and are  
17 intended for master planning purposes only."

18          **Q.     Beginning on Page 3, line 12, of Mr. Kalis's Surrebuttal, he discusses**  
19 **the Sewer District's "updated ... Master Plan to assure that facility planning was**  
20 **available, ...so the District would be capable of reacting to requests for service in a**  
21 **timely manner." Could you please respond to this assertion?**

22          A.     The "Master Plan" does not assure that facility planning is available nor  
23 does it conclude which facilities would be feasible and therefore which facilities should

Cross-Surrebuttal Testimony of  
Martin Hummel

1 be planned for. While the “Master Plan” is a good first step, it is a preliminary plan that  
2 lays out possible alternatives.

3 **Q. Please discuss Mr. Kalis’s Surrebuttal Schedule MPK-2.**

4 A. Schedule MPK-2 is a letter from a representative of customers that are  
5 located several miles south served by facilities that will have no connection with the  
6 proposed service area in question. Any benefit that they might receive would be  
7 speculation and PCRSD has not presented information showing that new service  
8 established near Platte City will somehow materially reduce the cost of service in their  
9 Parkville area.

10 **Q Is your recommendation still that the Certificate be granted to TCS?**

11 A. Yes

12 **Q. Does this conclude your testimony at this time?**

13 A. Yes.