

*Exhibit No.:*  
*Issue:* CCN Application  
*Witness:* Michael P. Kalis  
*Sponsoring Party:* Platte County Regional  
Sewer District  
*Type of Exhibit:* Direct/Rebuttal Testimony  
*Case No.:* SA-2010-0063  
*Date Testimony* February 9, 2010  
*Prepared*

PLATTE COUNTY REGIONAL SEWER DISTRICT

DIRECT / REBUTTAL TESTIMONY


OF

MICHAEL P. KALIS

CASE NO. SA-2010-0063

In the Matter of the Application of )  
Timber Creek Sewer Company for a ) **File No. SA-2010-0063**  
Certificate of Convenience and Necessity )

STATE OF KANSAS                    )  
  )  
COUNTY OF JOHNSON                )                    ss

  
Michael P. Kalis

**SUSAN BERNE**  
Notary Public - State of Kansas  
My Appt. Expires 4/11/2011

My Commission expires: 4/11/2011

**DIRECT / REBUTTAL TESTIMONY OF  
MICHAEL P. KALIS**

**Q. Please state your name and business address.**

A. My name is Michael P. Kalis. My business address is 8340 Mission Road Suite 240, Prairie Village, Kansas 66206.

**Q. What is your occupation?**

A. I have been a civil engineer for over 29 years. I am employed with HDR Inc. ("HDR|Archer") as a professional engineer licensed in both Kansas and Missouri, among other states.

**Q. What is your educational background?**

A. I graduated from the University of Kansas in 1980 with a Bachelor of Science Degree in Civil Engineering.

**Q. As a professional engineer, do you have a particular focus of attention in civil engineering?**

A. Yes. I primarily am involved in the design and construction of water and waste water facilities.

**Q. Please describe your experience in designing and constructing waste water treatment facilities.**

A. I have designed, or overseen the design, of over 30 waste water treatment facilities in the State of Missouri.

**Q. On whose behalf are you testifying in this proceeding?**

A. I am testifying on behalf of the Platte County Regional Sewer District, which I may refer to as the "Sewer District" or "District" in portions of my testimony.

1    **Q.    What is your business relationship with the Sewer District?**

2    A.    I was the project manager for the facility planning, design, and construction of the  
3           District's primary wastewater treatment facility, the Brush Creek Treatment  
4           Facility, built in 1997, and the treatment facility expansion, built in 2008. The  
5           initial project also included the design and construction of interceptor sewers, 4  
6           pump stations, and forcemains as part of a regionalization effort. We have served  
7           the District in an advisory role since the beginning of our business relationship,  
8           and since 1994, we have provided plan review services to the District. We have  
9           also provided planning services with the Preliminary Engineering Report for the  
10          Brush Creek Watershed Interceptor Sewer in 2005 and, most recently, the 2009  
11          Master Plan Update.

12   **Q.    So you are familiar with the Sewer Master Plan for the Platte County**  
13          **Regional Sewer District prepared in 1995 by Burns & McDonnell**  
14          **Engineering Company, as well as the 2009 Master Plan Update which was**  
15          **recently adopted and approved by the District Board of Trustees, is that**  
16          **correct?**

17   A.    Yes. I have reviewed the 1995 Burns & McDonnell document, and was the  
18          principal-in-charge of the 2009 Master Plan Update project. The document was  
19          prepared under my supervision and control, and I wrote portions of the document.  
20          The Executive Summary and specific portions of the Updated Plan are attached  
21          hereto as Schedule MPK-1.

22   **Q.    Have you had an opportunity to review the Application filed in this matter**  
23          **and the prefiled direct testimony of Mr. Derek Sherry?**

1 A. Yes. I have reviewed both the Application and Mr. Sherry's direct testimony  
2 along with the attached Schedules.

3 **Q. Could you briefly summarize the key components of the Master Plan Update**  
4 **("Updated Plan") as it relates to the application at issue in this proceeding?**

5 A. Yes. The Updated Plan outlined a process by which land use and density  
6 information was obtained from cooperative meetings with key entities, such as  
7 city and county planning departments and area developers, and was used to  
8 develop a land use map. From the land use map, the Updated Plan concluded that  
9 future development in Platte County would likely include generally suburban type  
10 development with moderate density around the metropolitan fringe, thus requiring  
11 centralized sewer service. Several planning basins, or watersheds, were identified  
12 as key basins for this type of future development. These facility planning basins  
13 are further studied in the Updated Plan, providing population estimates, flow  
14 projections, facility planning alternatives, facility sizing, capital cost estimates for  
15 the alternatives, and an alternative analysis for each basin. The proposed area in  
16 the subject application covers a large portion of Updated Plan's West Clear  
17 Branch Facility Planning Basin. The Updated Plan provides the framework for  
18 planning for and providing facilities in that area.

19 **Q. What would be the Sewer District's approach to providing service to the**  
20 **proposed service area?**

21 A. As discussed in Mr. Reineke's testimony, the District is uniquely situated to serve  
22 the proposed service area and such area is located within the existing corporation  
23 boundaries of the Sewer District. The Sewer District has cooperative agreements

1 with the City of Platte City and the City of Kansas City which would allow the  
2 Sewer District to transport sewage to either of those entities for treatment. This is  
3 a far more economical process than that proposed by Timber Creek when taking  
4 into account future growth in the service area, as it would provide for sewage  
5 collection and treatment without the need to construct additional treatment  
6 facilities as soon, if at all. Timber Creek indicated in their Data Request  
7 Responses that their available capacity between their two treatment plants is only  
8 343 to 398 connections; therefore, they would have to construct new or expand  
9 existing facilities for connections beyond that point. The District could take  
10 advantage of the significantly larger existing available capacity at the Platte City  
11 and Kansas City treatment facilities, which may or may not include any additional  
12 expansion of the treatment, depending on the build out of the area and of other  
13 adjacent areas tributary to those treatment facilities.

14 In regards to ultimate build-out of the area, the Updated Plan shows that  
15 the planned development in this basin is predominately in the upper reaches. An  
16 all-gravity solution in which gravity interceptors were extended downstream to a  
17 common point would involve excessive lengths of gravity sewer through areas of  
18 expected low density development and through the Platte River floodplain where  
19 the sewer would be inaccessible during flood events. Therefore, the Updated Plan  
20 identified and studied two facility alternative scenarios for the West Clear Branch  
21 Facility Planning Basin, involving multiple pump stations. In Scenario 1, flows  
22 gathered at various pump stations are conveyed in series to a pump station which  
23 then pumps to the Platte City Wastewater Treatment Plant for treatment by Platte

1 City. In Scenario 2, flows are gathered and conveyed in a similar manner to a  
2 new treatment facility owned and operated by the District, discharging to the  
3 Platte River. Since wastewater service is most efficient when planned on a  
4 watershed basis, it is important to consider these facility alternatives for ultimate  
5 build-out when determining service options as development occurs in an area.  
6 The District's cooperative agreements allow these sewer entities to work together  
7 when practical, efficient, and cost advantageous to provide the optimal service for  
8 an area.

9 **Q. At Page 7 and 8 of his direct testimony, Mr. Sherry describes Timber**  
10 **Creek's approach to provide service to the proposed service area at issue.**  
11 **Could you please address Timber Creek's plans as set forth in that**  
12 **testimony?**

13 **A.** Yes. The "Feasibility Study for Extended Service Area in Platte County",  
14 Schedule DS-9, outlines a sewer plan that includes initial construction of pump  
15 stations and two systems of forcemains to treatment at their two existing facilities,  
16 until construction of a new treatment facility is necessary. The District's plan  
17 would potentially pump to an existing treatment plant if the economic comparison  
18 merits it, and would similarly include pump stations and forcemain, however it  
19 could be to a single discharge point. This single discharge point could provide  
20 both cost and environmental benefits. The District has an agreement with the City  
21 of Platte City for cooperation in drainage areas common to both entities, including  
22 the City providing adequate capacity at the Platte City/District boundary and  
23 making their sewer system available to the District for connection. This would

1 include boundaries between Platte City and the District on the east side of  
2 Interstate 29, for conveyance to Platte City's wastewater treatment plant. This  
3 provides the opportunity for connections to an existing treatment facility far  
4 greater than that provided by Timber Creek's existing available capacity.  
5 Conversely, Data Request Responses provided by Timber Creek reveal that it has  
6 available capacity at its wastewater treatment plant on the east side of Interstate  
7 29 for only 43 to 68 equivalent dwelling units. The feasibility study shows a total  
8 of 129 estimated connections for years 2010 to 2012, so Timber Creek will have  
9 to provide the connection to their system on the west side of Interstate 29  
10 sometime in 2012 to utilize that portion of their available capacity. In total,  
11 Timber Creek has the capacity available for only 343 to 398 connections, which  
12 will not cover the ultimate number of connections estimated for the area by the  
13 Updated Plan.

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

15 **A.** Yes it does.