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*Issue(s):* *Revenues, Sewer and Water  
Revenues, Miscellaneous  
Revenues, Uncollectible  
Expense, Electricity  
Expense, Chemical  
Expense, Water Utility  
Bills*  
*Witness:* *Paul K. Amenthor*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct Testimony*  
*Case No.:* *WR-2023-0006*  
*Date Testimony Prepared:* *May 26, 2023*

**MISSOURI PUBLIC SERVICE COMMISSION**

**FINANCIAL AND BUSINESS DIVISION**

**AUDITING DEPARTMENT**

**DIRECT TESTIMONY**

**Cost of Service**

**OF**

**PAUL K. AMENTHOR**

**CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.**

**CASE NO. WR-2023-0006**

*Jefferson City, Missouri  
May 2023*

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PAUL K. AMENTHOR  
CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.  
CASE NO. WR-2023-0006**

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1 **DIRECT TESTIMONY OF**

2 **PAUL K. AMENTHOR**

3 **CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.**

4 **CASE NO. WR-2023-0006**

5 Q. Please state your name and business address.

6 A. My name is Paul K. Amenthor, and my business address is 111 N. 7<sup>th</sup> Street,  
7 Suite 105, St Louis MO 63101.

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 Regulatory Auditor.

11 Q. Please describe your educational background.

12 A. I graduated from Southern Illinois University at Edwardsville in December 2016  
13 with a Bachelor’s degree in Accounting.

14 Q. Have you previously filed testimony before this Commission?

15 A. Yes. Please refer to Schedule PKA-d1, attached to this direct testimony, for a  
16 list of cases in which I have previously filed testimony.

17 Q. What is the purpose of your direct testimony?

18 A. The purpose of my direct testimony is to provide a detailed explanation for  
19 adjustments proposed to Confluence Rivers Utility Operating Company, Inc.’s (“Confluence”)  
20 test year and recommendations in the revenue requirement in this rate case. This testimony will  
21 address water and sewer operating revenue, miscellaneous revenue, uncollectibles, electric  
22 expense, chemical expense, and water utility expense. Staff has experienced great difficulty in  
23 obtaining accurate and reliable data from Confluence with which to analyze and develop issues

1 in this case. Staff has included several recommendations within this testimony for Confluence  
2 in order to assist Company and Staff in future rate proceedings.

3 **REVENUE**

4 Q. What is the importance of revenue in setting rates for a regulated utility?

5 A. Revenue is important in setting rates as comparing operating revenue with the  
6 cost of service is a test of the adequacy of currently effective rates. If the cost of service exceeds  
7 revenue then an increase in rates is needed, and if the revenue exceeds the cost of service then  
8 an increase is not needed, and a possible reduction of rates may be necessary.

9 Q. Please, explain in general terms, what Confluence's water and sewer revenue  
10 consists of for each of its systems.

11 A. Included in this general rate proceeding, Confluence currently has 40 individual  
12 sewer systems within 16 different tariff rate districts and 25 individual water systems  
13 within 14 different tariff rate districts<sup>1</sup>. Staff has not included Shelton Estates in its rate case  
14 filing as Staff has learned that Confluence Rivers has not closed on this system as of the  
15 January 31, 2023 update period in this case. These systems are geographically dispersed  
16 throughout the state. Confluence's water systems consist of systems that are fully  
17 metered, systems that are fully unmetered, and systems that have both metered and unmetered  
18 customers. There are 10 systems with only metered rates, 15 systems with only flat rates, and  
19 4 of those 25 have a combination of metered and unmetered (flat rate) customers.

20 Q. Please explain the components that make up Confluence's water revenue.

21 A. Water revenue has two components, namely the customer "base" charge and the  
22 water commodity charge, for metered customers. Once calculated, the base charge and

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<sup>1</sup> Source: Confluence current tariffs.

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1 commodity charge (if any) are combined for total revenue. For unmetered customers, there is  
2 only a “base” charge. All of the water and sewer systems with the exception of Cedar Green  
3 have monthly tariff charges for both base and commodity. Cedar Green currently has quarterly  
4 tariff charges.

5 Q. How many water and sewer connections does Confluence have?

6 A. Confluence currently provides service to approximately 4,830 water connections  
7 and 5,053 sewer connections as of January 31, 2023.<sup>2</sup> Confluence provides water and/or sewer  
8 service to the following systems:

9

System	Water Connections	Wastewater Connections
Branson Cedar	58	59
Cedar Green	54	54
Berkshire Glen	0	32
Private Gardens	0	83
Wilmar Estates	0	85
Countryside Meadows	0	7
Park Estates	0	14
Fox Run	0	40
Country Hills	0	53
Clemstone	0	76
MO Utilities	142	134
Rainbow Acres	0	45
State Park Village	0	177
Twin Oaks	0	43
Auburn Lake	61	60
Calvey Brook	16	16
Eugene	58	0
Evergreen Lakes	76	0
Gladlo	68	63
Lake Virginia	0	38
Majestic Lakes	271	271
Mill Creek	0	75
Roy-L	60	57
Smithview	151	0
Villa Ridge	0	204
Willows	160	161

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<sup>2</sup> Staff Data Request 0100

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Paul K. Amenthor

Deer Run Estates POA	0	61
Deguire	0	24
Fawn Lake	29	0
Freeman Hills	0	16
Glenmeadows	233	233
Hillcrest	250	254
Indian Hills	675	0
Missing Well (Sun Valley)	73	30
Osage Water	374	392
Port Perry	438	267
Prairie Heights	56	0
Prairie Heights (Sullivan)	0	19
W.P.C. South Walnut Hills	0	84
West 16 <sup>th</sup> Street Hunter's Ridge	0	172
Villages at Whiteman	0	278
Spring Branch	115	0
Terre Du Lac	1,412	1,376

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Q. Prior to discussing Staff's annualized revenue position, did Staff have problems acquiring complete and adequate underlying revenue data?

A. Yes. Staff submitted data request 0071, attached to this testimony as Schedule PKA-d2, which requested the actual monthly customer water usage that was billed by each customer by tariff rate district for the period of October 1, 2019, through January 31, 2023. The time period requested covers from the true-up period in Confluence's prior rate case, WR-2020-0053, through the update period in the current case. In response to this data request, Staff was initially provided with only seven months (June 2022-December 2022) of customer usage for those systems that have metered usage. Confluence explained that due to a change in billing service providers the usage information was only available for this time period. Staff asked Confluence about the situation surrounding the change in billing service providers and discovered that during the period of time since Confluence's last rate case, the Company utilized three different billing service providers: Munibilling, Starnik, and Muni-Link. Munibilling was utilized between October 2019 through December 2020, Starnik was used

1 from January 2021 through May 2022, and the use of Muni-Link began June 2022 and continues  
2 through the update period, January 2023. However, Staff also learned that Central States Water  
3 Resources (“CSWR”) is performing actual billing in-house with Muni-Link software. From  
4 what Staff understands, this will occur moving forward. Staff also asked Confluence whether  
5 any further historical customer usage could be obtained from the prior billing service providers.  
6 Confluence later provided historical customer usage data; however Staff was only provided  
7 with data from January 2021 forward, and there was missing data for some systems within the  
8 data that was provided. The data was also in three different formats. Staff also learned that  
9 Confluence attempted to acquire its own usage data from Starnik but learned that there would  
10 be a fee for that data that could not be agreed upon by the parties. There also was no language  
11 within the contract with Starnik qualifying the data as owned by Confluence. In the latest  
12 contract for Muni-Link, that contract language was rectified so that Confluence can obtain its  
13 usage information should it change billing software providers in the future.

14 Q. Did Staff encounter any other issues?

15 A. Yes. The same issues with billing vendors occurred with the miscellaneous  
16 revenue data that Staff requested. In addition, there were many instances with the data in  
17 metered systems where the customer meter/service line size was marked as “unknown;”  
18 however, there are some tariffed rates that vary based on customer meter/service line size. In  
19 instances where the meter/service line size was not known, Staff reviewed the customer billing  
20 report to determine what rate the utility was using to bill the customer in order to determine the  
21 correct rate for Staff’s annualization.

1           **WATER REVENUE**

2           Q.     Describe how Staff determined its annualized amount of water revenue for  
3 Confluence for metered customers.

4           A.     The customer base charge is the minimum charge, whether monthly or quarterly,  
5 regardless of water consumption. Staff calculated the base charge for each system by  
6 multiplying the minimum monthly or quarterly charge for each system by the number of  
7 customers for each system, and then multiplied this by 12 billing months for customers billed  
8 monthly and by four for quarterly customers.

9           Staff calculated Confluence's commodity revenue for customers who have metered  
10 rates by taking the following steps:

11           First, Staff developed a normalized usage for each system:

- 12           • Eliminated individual customers who left the water system during  
13           the test year.
- 14           • Determined an annual usage for individual customers who joined the  
15           system during the test year to determine what that usage would have  
16           been for the months the customer was not on the system and did not  
17           receive service.
- 18           • Adjusted for substantial changes in customer usage during the test  
19           year.
- 20           • Adjusted usage for customers who changed premises within the  
21           service area during the test year.
- 22           • Normalized usage for those customers based upon the period of time  
23           for which usage data was available. This was generally 24 months  
24           or less, depending on when the customer joined the system.

25           Second, Staff determined the commodity annualized revenue for each system by  
26           applying the tariff rate to the normalized usage for each system.

27           Q.     Describe how Staff calculated Confluence's commodity revenue for customers  
28 who have flat water rates.



1           A.     For flat rate water customers, Staff developed the annual revenue for each  
2 system by multiplying the tariff rate for each system by the number of customers in each system,  
3 and then multiplied this by 12 billing months for customers billed monthly and by four for  
4 quarterly customers.

5                   **SEWER REVENUE**

6           Q.     Describe how Staff determined Confluence’s annual amount of sewer revenue.

7           A.     Similar to flat rate water customers, Staff developed the annual sewer revenue  
8 for each system by multiplying the tariff rate for each system by the number of customers in  
9 each system, and then multiplied this by 12 billing months for customers billed monthly and by  
10 four for quarterly customers.

11                   **MISCELLANEOUS REVENUES**

12          Q.     Please describe what miscellaneous revenues are.

13          A.     Miscellaneous revenues consist of late payment charges, disconnect and  
14 reconnect fees, customer installation fees, service call fees, and other miscellaneous charges.

15          Q.     Did Staff encounter any issues with the miscellaneous revenue data provided by  
16 Confluence?

17          A.     Yes. As mentioned above in the discussion regarding operating revenue, the  
18 same problems with billing vendors, data formats, and missing data were an issue. In addition,  
19 Confluence records late fees in its own account, but bundles disconnect, reconnect fees, non-  
20 sufficient fund fees, installation fees, service call fees, and other miscellaneous charges into one  
21 account. While the Uniform System of Accounts (“USOA”) for water and wastewater utilities  
22 prescribes utilizing Account 470 (water) and Account 532 (wastewater) for forfeited discounts  
23 (late fees) and Account 471 (water) and Account 536 (wastewater) for other miscellaneous

1 revenue, there is currently no delineation within the general ledger to separate the different  
2 types of miscellaneous revenue.

3 Q. How did Staff approach Confluence's miscellaneous revenues?

4 A. Staff reviewed a history of late fees for the time period available to Staff,  
5 January 2021 through January 2023. At this time, Staff believes test year is the most  
6 appropriate level of miscellaneous revenue to include in the cost of service since  
7 Confluence recorded the other fees and charges within one account with no delineation and  
8 the billing report data that was provided is in three different formats. Staff continues to sort  
9 out the other miscellaneous charges by customer, within the billing report data, and may  
10 propose an adjustment in its rebuttal testimony if further analysis of the data shows an  
11 adjustment is applicable.

12 Q. Is there concern by Staff regarding how Confluence currently records its  
13 miscellaneous revenue?

14 A. Somewhat. While Confluence is correctly following the USOA for recording  
15 miscellaneous revenue, it is difficult for Staff to assess and analyze the miscellaneous revenue  
16 that is combined in account 471, as the general ledger does not delineate the types of revenue  
17 by transaction that are recorded within the account. Staff should be able to review the billing  
18 report by customer to determine the type of miscellaneous charge each customer incurs by  
19 month but also be able to compare that to the same type of revenue within the general ledger in  
20 order to propose an adjustment that is a correct "apples to apples" comparison.

21 Q. At this time, what is Staff's recommendation concerning miscellaneous  
22 revenues?

1           A.     Staff recommends that Confluence record miscellaneous revenues as it has  
2 using USOA account 470 and 532 for late fees and 471 and 536 for the remaining miscellaneous  
3 fee types; however for each type of miscellaneous revenue Confluence needs to delineate a  
4 special minor account. For instance, miscellaneous charges are recorded in “major” account  
5 471, but Staff suggests that Confluence then delineate the separate tariffed miscellaneous  
6 revenue types that are within that major account through a “minor” account designation  
7 such as “Disconnect/Reconnect Fees” in account 471.1, non-sufficient fund fees (NSF fees) in  
8 account 471.2, etc.

9           **UNCOLLECTIBLE EXPENSE**

10          Q.     What is uncollectible expense?

11          A.     Uncollectible expense, also known as bad debt expense, is the portion of water  
12 or sewer revenue that Confluence accrues and records on its books reflecting the amount the  
13 company believes it will be unable to collect from customers due to customers not paying their  
14 bills. Bad debt (or an allowance for doubtful accounts) differs from net write-offs in that a net  
15 write-off is not an accrued expense for bad debt but an actual uncollected amount that is netted  
16 with any payments that Confluence was finally able to receive for an account. Staff includes  
17 net write-offs in the cost of service rather than bad debt, as write-offs are known and  
18 measureable and bad debt is an educated estimate of what amounts of customer revenue the  
19 Company expects will not be collected in the future.

20          Q.     Please explain Confluence’s process of maintaining and collecting its bad debt  
21 expense.

22          A.     Confluence maintains an allowance for doubtful accounts (bad debt expense)  
23 that the Company accrues to every month. As actual amounts charged to customers become

1 overdue, those amounts are notated, written off at the end of each year, and removed from the  
2 bad debt account. Once the amount is written-off, Confluence sends these uncollectible  
3 balances to a collections agency named CBE Group. Confluence submits accounts with a  
4 balance greater than \$500 and over 90 days past due to CBE Group for collection. Then, CBE  
5 Group charges a contingent fee of 25% of the balances collected and remits the remaining  
6 collected balance back to Confluence. Confluence then nets the amount collected against the  
7 previously written-off amount. This netting is considered a “net write-off”.

8           When a customer cannot pay its bill for water, Confluence can take the measure of  
9 turning off a customer’s water service; however for sewer service, it is very difficult and costly  
10 to shut off sewer service, and shutting off sewer service can be considered a health and safety  
11 issue. In order for Confluence to incentivize its customers to pay their sewer bill, for those  
12 systems in which Confluence is not the water provider, Confluence has executed a written  
13 agreement with at least one water company whereby Confluence can notify the water company  
14 to shut off a certain customer for non-payment of their sewer bill. At this point Confluence has  
15 not had to utilize this, but can if needed.

16           Q.     Please explain how Confluence currently records bad debt expense and net  
17 write-offs in its books and records.

18           A.     Confluence currently records its bad debt by consolidated system by month, but  
19 records its direct write-offs by consolidated system by year. For example, the consolidated  
20 systems the Company uses are Confluence Rivers, Elm Hills, Hillcrest, Indian hills, Osage and  
21 Raccoon Creek; however, each of these consolidated systems consists of numerous and separate  
22 underlying water and sewer systems. There are two problems with this current format; first,  
23 just because multiple systems may be combined into a consolidated system does not mean that

1 each underlying system has customers with the same payment habits. In addition, this created  
2 a situation where Staff needed to develop a percentage of bad debt and net write-offs per system  
3 to ensure proper distribution of the net write-offs within the consolidated system. Staff  
4 calculated this percentage based on customer connection counts by each individual system  
5 underlying the consolidated system. Second, in order to appropriately compare the bad debt  
6 expense to the net write-offs; both should be recorded on a monthly basis.

7 Q. Please, explain Staff's adjustment to uncollectibles.

8 A. As explained above, Staff utilized the customer connection count by  
9 individual water and sewer system to develop a percentage to apply to the bad debt expense and  
10 net write-offs. This calculation created a bad debt amount by month by individual system and  
11 created a net write-off amount by year by individual system. Since rates are set on annual  
12 amounts, Staff included the 12 months ending December 31, 2022, net write-offs in the cost of  
13 service for all systems.

14 Q. What does Staff recommend regarding Confluence's recording of bad debt and  
15 net write-offs?

16 A. Staff recommends that the Commission order Confluence to start recording its  
17 bad debt expense and net write-offs by month and by individual system, separately for water  
18 and sewer. This is necessary for Staff to be able to review 12-month periods of both bad  
19 debt expense and net write-offs when a test year or update period during a rate case does not  
20 necessarily land squarely during a calendar year, such as the current rate case where the test  
21 year ends June 30, 2022.

22 **ELECTRICITY EXPENSE**

23 Q. What is electricity expense?

1           A.     Electricity expense is the cost incurred by Confluence to supply electricity to its  
2 water and sewer plants for pumping, aerators, blowers, etc. in order to provide service to its  
3 customers as part of its daily operations.

4           Q.     What level of electric expense has Staff included in the cost of service  
5 calculation?

6           A.     Staff reviewed electric invoices from October 2019 thru January 2023 and  
7 removed any late payment fees and rounded up bill amounts as this would be considered a  
8 donation. Staff also annualized the electric expense for those systems that were acquired during  
9 the test year in which there was not an entire 12 months of expense.

10          Q.     Does Staff have any recommendations regarding maintenance of electric  
11 expense records?

12          A.     Yes. Staff recommends that the Commission order Confluence, moving  
13 forward, to maintain a general list with the following information: the name of the system, the  
14 system type (water or wastewater), the name of the electric provider, the number of bills at each  
15 water and wastewater system, the type of asset receiving service for each electric bill, such as  
16 a lift station, well, lagoon, treatment plant, etc., and the phase of electricity used for each. This  
17 information will be very helpful for Staff in analyzing the electricity issue in a future rate case  
18 and, as this information should not change often, it should be relatively easy for Confluence to  
19 maintain. In addition, Confluence needs to maintain all invoice information with detailed usage  
20 and breakdown of all charges as Staff had difficulty in obtaining all of the electric invoices with  
21 this information in this case.

22           **CHEMICAL EXPENSE**

23          Q.     What is chemical expense?

Direct Testimony of  
Paul K. Amenthor

1           A.     Confluence uses chemicals in its day-to-day operations to treat water for human  
2 consumption and use, and to treat wastewater systems for safe outfall to the bodies of water in  
3 the state. While not a complete list, chemicals commonly used, for which Confluence incurs  
4 expenses, are chlorine and dechlorination tablets, among others.

5           Q.     What did Staff discover during its review process?

6           A.     During its review process, Staff noticed missing quantities on some invoices,  
7 such as when operators purchase the chemicals, and that some invoices had bulk quantities of  
8 chemicals or total invoice amounts split between multiple systems without any explanations or  
9 rationale for how the amount was allocated. Typically, the invoice dollar amount was simply  
10 spread over the number of systems that utilized the chemical. In its response to Staff Data  
11 Request No. 0075, Confluence stated that chemicals are purchased in bulk quantities and  
12 facility usage is not tracked by month. However, because there is no tracking of amounts and  
13 cost per amount by system nor tracking of amounts used by system, Staff cannot determine the  
14 cost per quantity and frequency of purchase nor the cost and quantity and frequency of use of  
15 each type of chemical used. Staff noted that many times chemicals are purchased by third party  
16 contracted operators who add a markup percentage on top of the actual cost for the chemicals.

17          Q.     Did Staff issue discovery regarding Confluence's chemical purchase and use  
18 practices?

19          A.     Yes. In response to Staff Data Requests 0075.1 and 0075.2, when asked if there  
20 would be any impediment to Confluence or a third party operator documenting the quantity of  
21 chemicals that are used at each separate sewer system on a quarterly basis, the Company  
22 indicated that there is no impediment in implementing Staff's recommendations going forward.  
23 Ideally, Staff recommends the chemical use be recorded by each facility (i.e. treatment plant,

1 well) within each water and wastewater system on a monthly basis. However if a quarterly  
2 basis is agreed upon or ordered by the Commission, the operator must log the type of chemical  
3 and amount used with dates by the end of each quarter (March, June, September, December)  
4 and not at a later date.

5 Q. Explain Staff's recommendations concerning chemical expense.

6 A. Confluence's response to discovery has stated that the amount of bulk chemicals  
7 purchased for wastewater are intended to last a year and the bulk amount of chemicals  
8 purchased for water are intended to last approximately 4-6 months, however there is no way for  
9 Staff to verify this as chemical usage is currently not tracked at each system. At this time, Staff  
10 cannot determine, based upon the invoices alone, whether the amounts of chemicals purchased  
11 by Confluence are for use over one month, one year, or multiple years. Staff also cannot  
12 accurately determine what chemicals are used at each system nor the amount of each chemical  
13 used at each system. In addition, while some invoices have the quantity and cost of each  
14 chemical purchased, not all invoices have this information, such as the chemical purchases by  
15 the operators. Staff recommends that the Commission order Confluence to maintain a quarterly  
16 or monthly log with dates including the quantity of each chemical used at each facility within  
17 each water and wastewater system. This includes any chemicals purchased in bulk that are  
18 utilized at multiple water and wastewater systems. Staff also recommends that the Commission  
19 order Confluence to ensure that all chemical invoices contain the quantity and price of each  
20 chemical purchased, whether directly purchased by CSWR or by the operator. This will allow  
21 Staff to understand what chemicals are used at each facility at each system, analyze the types  
22 of chemicals used at each facility at each system, the chemical quantities purchased, the length  
23 of time it takes to deplete the quantity of chemical purchased, as well as assess pricing changes



1 for each chemical over time. Finally, Confluence should separately maintain documentation of  
2 the type of chemicals used at each water and sewer facility.

3 **WATER UTILITY EXPENSE**

4 Q. Please describe what water utility expense is.

5 A. Water utility expense is the cost incurred by Confluence's use of water at its  
6 sewer only facilities for general use, such as washing hands and cleaning equipment. Water  
7 usage at the wastewater systems is minimal as the water cannot be utilized in the wastewater  
8 treatment process as it raises concerns that effluent is being diluted.

9 Q. What level of water utility expense has Staff included in its cost of service?

10 A. Staff reviewed water invoices from October 2019 through January 2023,  
11 removed any late payment fees and annualized the water utility expense for Clemstone, a new  
12 wastewater system acquired by Confluence in April 2022.

13 **RECOMMENDATION SUMMARY**

14 Q. Please summarize the recommendations that Staff is requesting the Commission  
15 order Confluence to perform on a going forward basis.

16 A. Staff recommends the Commission order Confluence to do the following:

- 17 • Retain the monthly billing reports and customer usage data for the  
18 period January 1, 2021 through January 31, 2023. Maintain complete  
19 and accurate monthly billing reports for each water and wastewater  
20 system, beginning with February 1, 2023 through the true-up cutoff in  
21 Confluence River's next general rate proceeding, that include individual  
22 columns for:
- 23 ○ Account number, customer name, customer address, billing  
24 address, Meter ID, Meter/Service Line size, the dates  
25 service began, the dates service ended, the usage gallons,

1 and revenue dollars charged separately by base charge,  
2 commodity charge and by each type of miscellaneous  
3 revenue that may have been charged.

- 4 • Record miscellaneous revenues using USOA account 470 and 532 for  
5 late fees as well as 471 and 536 for the remaining miscellaneous fee  
6 types; however for each type of miscellaneous revenue Confluence  
7 needs to delineate a special minor account in its general ledger moving  
8 forward.
- 9 • Record its bad debt expense and net write-offs by month and by system,  
10 separately for water and sewer, as well as maintain the amounts  
11 withheld by CBE Group for payment with the associated customer  
12 account to which the information pertains.
- 13 • Maintain a general list, including the name of the system, the system  
14 type (water or wastewater), the name of the electric provider, the  
15 number of bills at each water and wastewater system, the type of asset  
16 receiving service for each electric bill such as a lift station, well, lagoon,  
17 treatment plant, etc. and the phase of electricity used for each. In  
18 addition, Confluence needs to maintain all invoices so they are readily  
19 available with detailed usage and a breakdown of all charges.
- 20 • Maintain a list of the type of chemicals used at each facility at each  
21 water and wastewater system. Maintain a quarterly or monthly log with  
22 dates, including the type of chemical used and the quantity of each  
23 chemical used at each facility at each water and wastewater system.  
24 This includes any chemicals purchased in bulk that are utilized at  
25 multiple water and wastewater systems. Ensure that all chemical  
26 invoices contain the quantity and price of each chemical purchased,  
27 whether directly purchased by CSWR or by the operator.

28 Q. Does this conclude your direct testimony?

29 A. Yes it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Confluence Rivers Utility )  
Operating Company, Inc.'s Request for ) Case No. WR-2023-0006  
Authority to Implement a General Rate )  
Increase for Water Service and Sewer )  
Service Provided in Missouri Service Areas )

**AFFIDAVIT OF PAUL K. AMENTHOR**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF ST. LOUIS )

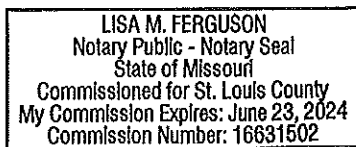
**COMES NOW PAUL K. AMENTHOR** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Paul K. Amenthor*; and that the same is true and correct according to his best knowledge and belief.

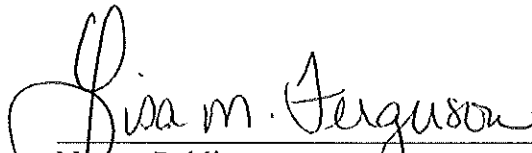
Further the Affiant sayeth not.

  
**PAUL K. AMENTHOR**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the City of St. Louis, State of Missouri, at my office in St. Louis, on this 26<sup>th</sup> day of May 2023.



  
Notary Public

**Paul K. Amenthor**

**EDUCATIONAL BACKGROUND AND EXPERIENCE**

In December of 2016, I graduated from Southern Illinois University Edwardsville with a Bachelor of Science in Accounting. I have also earned a Bachelor of Science in Economic and Management with an emphasis in Accounting Sciences from the University of Lomé, Togo in June of 2007.

I commenced employment with the Missouri Public Service Commission as Utility Regulatory Auditor in September 2017. As a Utility Regulatory Auditor II, I am responsible in part, for assisting with the audit and examination of the books and records of utility companies operating within the State of Missouri and sponsoring testimony as an expert witness in Commission proceedings.

Prior to employment with the Commission, I worked with Walmart from June 2011 to August 2017, as an Inventory Management Associate. In this position, I was primarily responsible for ensuring the accuracy of on-hand inventory in the warehouse.

I also worked with Lee Enterprises (Lee Finance) from March 2017 to August 2017 as a Circulation Accounting Clerk. In this position, I was primarily responsible for processing customers' remittances, invoices, and accounts deposits. I also provided support for senior staff with each end of month closing.

**Paul Amenthor**

**CASE PARTICIPATION**

<b><u>Company Name</u></b>	<b><u>Case No.</u></b>	<b><u>Issues</u></b>
Confluence Rivers (Water and Sewer)	WR-2023-0006 SR-2023-0007	Electric Expense, Chemical Expense, Operating Revenue, Miscellaneous Revenue, Uncollectible Expense, Water Losses, Water Expense
Ameren Missouri (Electric)	ER-2022-0337	Payroll & Related Payroll Taxes Employee Benefits.
Spire-Investor (Gas)	GR-2022-0179	Prepayments, Customer Deposits, Customer Advances, Rents and Leases Expense, Materials & Supplies, Plant In Service and Depreciation Reserve, Injuries & Damages, PSC Assessment, Insurance Expense, Line Locating Costs, Fuel Expense, Software and IT Costs, Capitalized O&M Depreciation, Natural Gas Inventory
Ameren Missouri (Electric)	ER-2021-0240	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses MEEIA Test Year Labor and Non- Labor Expenses Non-Labor Power Plant maintenance Severance costs Permanent Cleaning procedures Call Center Costs Cybersecurity, software OPEB, Pension & trackers , SERP Non-qualified expense External Audit fees
Ameren Missouri (Gas)	GR-2021-0241	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses Non-Labor Distribution maintenance Severance costs Permanent Cleaning procedures Call Center Costs Cybersecurity, software OPEB, Pension & trackers , SERP Non-qualified pension expense External Audit fees

**Paul K. Amenthor**

<u>Company Name</u>	<u>Case No.</u>	<u>Issues</u>
Missouri American Water Company (Water)	WR-2020-0344	Leases (Rents and Transportation), Rate Case Expense, Telecommunication Expense
Ameren Missouri (Electric)	ER-2019-0335	Payroll & Related Payroll Taxes Employee Benefits, Employee Relocation Expenses MEEIA Test Year Labor and Non-Labor Expenses Callaway Refueling OT Labor and non-Labor Real & Property Taxes Non-Labor Power Plant maintenance Dues & Donations Miscellaneous Expenses Severance costs
Ameren Missouri (Electric)	EA-2019-0371	CCN Filing
Ameren Missouri (Gas)	GR-2019-0077	<b>Rate Base Items:</b> Prepayments, customer advances, customer deposits, Plant in service, Accumulated Reserve, natural gas inventories, materials and supplies <b>Revenues:</b> Customer Growth/seasonality, Removal of GRT, PGA, Unbilled Revenue, Provision for Rate Refunds, and Other Revenues <b>Expenses:</b> Uncollectible Expense, Capitalized depreciation, Non Labor Distribution Maintenance, and Interest on Customer Deposits Filed Direct, Surrebuttal/True-Up
Liberty Midstates Natural Gas (MNG)	GR-2018-0013	Advertising, Miscellaneous expenses, Insurance expense, regulatory expense, Environmental expense, Dues and Donations  Filed Direct, Surrebuttal/True-Up

# Missouri Public Service Commission

## Respond Data Request

<b>Data Request No.</b>	0071
<b>Company Name</b>	Confluence Rivers Utility Operating Company, Inc.-(Water)
<b>Case/Tracking No.</b>	WR-2023-0006
<b>Date Requested</b>	1/23/2023
<b>Issue</b>	Revenue - Other Revenue Issues
<b>Requested From</b>	Aaron Silas
<b>Requested By</b>	Ron Irving
<b>Brief Description</b>	Customer Meter Usage
<b>Description</b>	1. Please provide the actual monthly billed water usage that was billed by each customer (including name and service address), delineating which tariffed rate district the customer belongs, for the period of October 1, 2019 through current, updating information as available. 2. Identify all instances, by month, by Missouri system, by customer name and service address, where estimated usages were used to bill a customer. For each instance please provide the reason for each estimated billing and explain the reason for estimated billing in detail. Data Request submitted by Lisa Ferguson (lisa.ferguson@psc.mo.gov)
<b>Response</b>	1) Please refer to the attachments entitled "DR 71-1 - MO Usage" for the requested information; due to a change in billing service providers from Starnik to Munilink, usage information is only available for June-December 2022. 2) Please refer to attachment "DR 71-2 - MO-Estimated_Readings - 2021-2022" for the requested information.
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **WR-2023-0006** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Confluence Rivers Utility Operating Company, Inc.-(Water)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Confluence Rivers Utility Operating Company, Inc.-(Water)** and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security :</b>	Public
<b>Rationale :</b>	NA

# Missouri Public Service Commission

## Respond Data Request

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<b>Response</b>	In response to PSC's Supplemental Data Request: Please refer to the additional files provided on 3/6/2023 in the folder entitled "CONFIDENTIAL Confluence Rivers Starnik Data" in the Data Room shared by Confluence Rivers on 1/21/2023. Upon termination of services with Starnik, the Company was informed by Starnik that they would charge a fee to turn over historical data. The Company could not reach an agreement with Starnik on the amount of said fee and Starnik informed the Company that they would not archive historical data. As such, this data cannot be obtained from Starnik.
<b>Objections</b>	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **WR-2023-0006** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Confluence Rivers Utility Operating Company, Inc.-(Water)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Confluence Rivers Utility Operating Company, Inc.-(Water)** and its employees, contractors, agents or others employed by or acting in its behalf.

<b>Security :</b>	Public
<b>Rationale :</b>	NA