

EXHIBIT NO.  
ISSUE: REVENUE REQUIREMENT  
WITNESS: MAYOR KATHY ROSE  
TYPE OF EXHIBIT: DIRECT  
TESTIMONY  
SPONSORING PARTY: CITY OF  
RIVERSIDE  
CASE NUMBER: WR-2011-0337  
DATE PREPARED: NOVEMBER 17,  
2011

MISSOURI-AMERICAN WATER COMPANY

WR-2011-0337

DIRECT TESTIMONY OF

**MAYOR KATHY ROSE**

BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION

ON BEHALF OF

CITY OF RIVERSIDE

NOVEMBER 17, 2011

1 Missouri-American Water Company

2 WR-2011-0337

3 Direct Testimony of Mayor Kathy Rose

4 **Q. PLEASE STATE YOUR NAME.**

5 A. My name is Kathy Rose.

6 **Q. ON WHOSE BEHALF ARE YOU APPEARING FOR THE PURPOSES OF THIS**  
7 **DIRECT TESTIMONY?**

8 A. I am appearing for the purposes of this testimony on behalf of intervenor City of  
9 Riverside (the "City"). The City receives service directly and its residents also receive  
10 service from Missouri-American Water Company ("MAWC").

11 **Q. PLEASE DESCRIBE YOUR EMPLOYMENT.**

12 A. I am the Mayor of the City.

13 **Q. WHAT IS YOUR INTEREST IN THIS PARTICULAR CASE?**

14 A. I am testifying as a representative of the City, which is attempting to protect its citizens in  
15 the present case. The City is within the Parkville District, subject to the Platte County  
16 water tariff at issue in this case.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of my testimony is to address whether the City supports a consolidated tariff  
19 rate structure and to address certain water service and public safety issues affecting the  
20 City.

1 **Q. DOES THE CITY SUPPORT A CONSOLIDATED TARIFF RATE STRUCTURE**  
2 **AS REQUESTED BY MAWC IN THIS CASE?**

3 A. Yes, provided that the water rates applicable to customers located within the City are  
4 reduced by at least the amount described in MAWC's materials filed in this case.  
5 However, the City also believes that the inadequate fire flows produced by MAWC's  
6 water distribution system, as described in the testimony submitted by David Blackburn in  
7 this case, should be a factor in determining the final tariff rates.

8 **Q. DOES THE CITY BELIEVE THAT MAWC SHOULD TAKE FURTHER**  
9 **ACTION TO ADDRESS THE CITY'S PUBLIC SAFETY CONCERNS**  
10 **REGARDING FIRE FLOWS?**

11 A. Yes, the City is very concerned about the public safety issues created by the inadequate  
12 fire flows produced by MAWC's water distribution system, and is not satisfied with  
13 MAWC's previous responses to this issue. The City believes that MAWC should take  
14 every reasonable action to correct the fire flow deficiencies within the water distribution  
15 system. At a minimum, MAWC must take action in good faith in order to address these  
16 issues. For example, if MAWC could commit to improve the fire flows within the City to  
17 comply with the City's current fire flow requirements based on the 2003 International  
18 Fire Code by the year 2020, and to add at least one fire hydrant (or a number as agreed  
19 between MAWC and the City's Fire Chief) to the water distribution system within the  
20 City per year, it would be a step in the right direction.

1 **Q. BASED ON THE FOREGOING, WHAT RELIEF ARE YOU REQUESTING IN**  
2 **RELATION TO THESE ISSUES?**

3 A. The City believes that a consolidated rate structure should be adopted only if the water  
4 rates applicable to customers located within the City are reduced by at least the amount  
5 described in MAWC's materials filed in this case, and that the inadequate fire flows  
6 produced by MAWC's water distribution system should be a factor in determining the  
7 final tariff rates. The City also believes that MAWC is obligated to keep its infrastructure  
8 reasonably updated to comply with the City's reasonable fire flow requirements, and that  
9 the costs of any necessary or advisable upgrades should be shared by MAWC's equity  
10 owners. Therefore, the City requests that a consolidated tariff rate structure and final  
11 tariff rates consistent with the foregoing be adopted in this case. The City also requests  
12 that MAWC be required to take reasonable action in good faith to update its water  
13 distribution system in order to comply with the City's reasonable fire flow requirements  
14 consistent with the foregoing, and to ensure that the equity owners of MAWC share in the  
15 cost of such improvements in a reasonable manner.

16 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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In the matter of Missouri-American )  
Water Company's Request for Authority )  
to Implement a General Rate Increase )  
for Water and Sewer Service Provided )  
in Missouri Service Areas )

Case No. WR-2011-0337

Affidavit of Mayor Kathy Rose

11 State of Missouri )  
12 ) ss.  
13 County of Platte )

Kathy Rose, being first duly sworn, on her oath states:

- 1. My name is Kathy Rose. I am Mayor of the City of Riverside, Missouri.
- 2. The above Direct Testimony in question and answer form was prepared by me, or at my direction.
- 3. I hereby swear and affirm that the aforesaid written direct testimony is true and accurate to the best of my present knowledge, information and belief.

Kathy Rose  
Kathy Rose

Subscribed and sworn to before me on this 17th day of November, 2011.

Sheila Payne  
Notary Public

My commission expires:

