

Exhibit No.:
Issue: *Need for Distribution System
Rehabilitation*
Witness: *David A. Spratt*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *WR-2017-0259*
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MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

WATER AND SEWER DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DAVID A. SPRATT

INDIAN HILLS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2017-0259

Jefferson City, Missouri
November 2017

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **DAVID A. SPRATT**

4 **INDIAN HILLS UTILITY OPERATING COMPANY, INC.**

5 **CASE NO. WR-2017-0259**

6 Q. Please state your name and business address.

7 A. David A. Spratt, 200 Madison Street, Suite 500, Jefferson City, MO 65101.

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

9 A. I am a Utility Operations Technical Specialist II in the Water and Sewer
10 Department ("Staff") for the Missouri Public Service Commission ("Commission").

11 Q. Are you the same David Spratt that authored direct testimony in this case?

12 A. Yes I am.

13 Q. What is the purpose of your testimony?

14 A. The purpose of my testimony is to rebut a portion of the testimony by Office of
15 the Public Counsel ("OPC") witness John Robinett where he states "...repair costs are likely
16 imprudent on a going forward basis because of the substandard material and the mains and
17 service connections need to be replaced."

18 Q. Does Staff agree with this position?

19 A. No. Precisely because of the current condition of the piping and materials in the
20 ground, ongoing repairs will continue to be necessary. Failure to repair a leaking service line or
21 main can result in a loss of service to customers, damage to property, as well as an economic
22 hardship on the company.

Surrebuttal Testimony of
David A. Spratt

1 Q. In your direct testimony, you say that Staff and the Company agree that
2 replacement is a better alternative than repairs. Are you changing your stance on that?

3 A. No. Replacement of service lines and mains is still going to be necessary but they
4 would be most efficiently done through a systematic replacement program. For example, the
5 main and service connections along an entire street should all be replaced at once. However,
6 while this replacement program is ongoing, individual repairs must still be made. Therefore,
7 ongoing repair costs are prudent, and unavoidable.

8 Q. Has the Company agreed to perform a systematic main replacement program for
9 the Indian Hills Utility Operating Company, Inc.'s service territory?

10 A. Yes. Please see Item (7) of the signed partial disposition agreement as referenced
11 in Jennifer Grisham's rebuttal testimony.

12 Q. Does this conclude your testimony?

13 A. Yes, it does.

