Exhibit No.: Issue: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

Need for Distribution System Rehabilitation David A. Spratt MoPSC Staff Surrebuttal Testimony WR-2017-0259 November 13, 2017

# **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	А.	David A. Spratt, 200 Madison Street, Suite 500, Jefferson City, MO 65101.
8	Q.	By whom are you employed and in what capacity?
9	А.	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	А.	Yes I am.
13	Q.	What is the purpose of your testimony?
14	А.	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	А.	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 would be most efficiently done through a systematic replacement program. For example, the 4 5 main and service connections along an entire street should all be replaced at once. However, while this replacement program is ongoing, individual repairs must still be made. Therefore, 6 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 Yes. Please see Item (7) of the signed partial disposition agreement as referenced A. in Jennifer Grisham's rebuttal testimony. 11 12 Q. Does this conclude your testimony? 13 A. Yes, it does.

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In The Matter of The Rate Increase Request Of Indian Hills Utility Operating Company, Inc.

Case No. WR-2017-0259

#### AFFIDAVIT OF DAVID A. SPRATT

State of Missouri ) ) ss County of Cole )

**COMES NOW** David A. Spratt, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Surrebuttal Testimony*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

David A. Spratt

#### **JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 13 h day of November, 2017.

DUCHER L- VOIG

DIANNA L. VAUGHT
Notary Public - Notary Seal State of Missouri
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019 Commission Number: 15207377
Commission Number: 15207377