

Exhibit No.:  
Issue: Exploratory well  
Witness: Martin Hummel  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Rebuttal Testimony  
File No.: SR -2010-0320  
Date Testimony Prepared: December 21, 2010

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**REBUTTAL TESTIMONY**

**OF**

**MARTIN HUMMEL**

**TIMBER CREEK SEWER COMPANY**

**FILE NO. SR-2010-0320**

*Jefferson City, Missouri  
December 2010*

Exhibit No. 18  
Date 1-5-11 Reporter JH  
File No. SR-2010-0320

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Timber )  
Creek Sewer Company Request for a Rate )  
Increase. )

File No. SR-2010-0320

**AFFIDAVIT OF MARTIN HUMMEL**

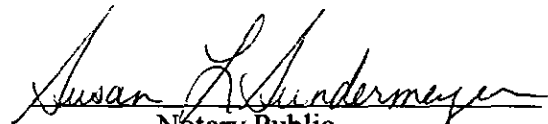
STATE OF MISSOURI     )  
                                      ) ss  
COUNTY OF COLE     )

Martin Hummel, of lawful age, on his oath states: that he has participated in the preparation of the following Rebuttal Testimony in question and answer form, consisting of 2 pages of Rebuttal Testimony to be presented in the above case, that the answers in the following Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Martin Hummel

Subscribed and sworn to before me this 20<sup>th</sup> day of December, 2010.

DAN L. SUNDERMEYER  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Callaway County  
My Commission Expires: October 03, 2014  
Commission Number: 10942086

  
\_\_\_\_\_  
Notary Public

SUSAN L. SUNDERMEYER  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Callaway County  
My Commission Expires: October 03, 2014  
Commission Number: 10942086

**REBUTTAL TESTIMONY**

**OF**

**MARTIN HUMMEL**

**TIMBER CREEK SEWER COMPANY**

**FILE NO. SR-2010-0320**

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

**A. Martin Hummel, P.O. Box 360, Jefferson City, MO 65102.**

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

**A. I am employed by the Missouri Public Service Commission (Commission) as a Utility Engineering Specialist III in the Water & Sewer Department of the Utility Operations Division.**

**Q. Are you the same Martin Hummel that filed Direct Testimony in this case?**

**A. Yes.**

**Q. Please summarize the Rebuttal Testimony you are presenting.**

**A. I am responding to the Direct Testimony of Derek Sherry of Timber Creek Sewer Company. This response is specific to the issue of the exploratory well and pages 13, 14, and 15 of Mr. Sherry's Direct Testimony.**

**Q. On page 13 of Mr. Sherry's testimony he compares energy options of solar, wind and natural gas, is this a valid comparison as presented?**

**A. No. Mr. Sherry presents what is supposed to be an estimate of payback period, which is the time it will take to recoup the investment necessary to develop each of the three energy sources. With solar, the assumption is that there will be solar energy available to harness, true. With wind, the assumption is that there will be wind energy available to**

Rebuttal Testimony of  
Martin Hummel

1 harness, true. With natural gas the assumption that there is natural gas energy available is  
2 likely false and at best speculative. Since Mr. Sherry's comparison of the three energy  
3 sources does not account for the likelihood that natural gas will not be available, the  
4 comparison is invalid and the conclusions on payback are of no value.

5 **Q. On page 14 of Mr. Sherry's testimony Tiffany Springs is suggested as a**  
6 **location where natural gas was found. Does Timber Creek present any information to**  
7 **show that there has been natural gas production at Tiffany Springs that was viable**  
8 **without artificial support such as tax incentives or government grants?**

9 A. No.

10 **Q. On page 14, line 8, of his testimony, Mr. Sherry states "The Company**  
11 **continued its research through several discussions with USGS, DNR, manufacturers of**  
12 **natural gas generators and oil/gas drillers." Has Timber Creek ever stated what it**  
13 **considered to be the likelihood of finding natural gas at the treatment plant site?**

14 A. No.

15 **Q. Did Timber Creek discuss with the PSC Staff the prospect of drilling for**  
16 **natural gas and developing it as an energy source for the sewage treatment plant prior**  
17 **to this rate case?**

18 A. No.

19 **Q. Does the Direct Testimony of Mr. Sherry or other information presented**  
20 **by Timber Creek show that the cost of the exploratory well was prudently incurred?**

21 A. No.

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

23 A. Yes.