

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

In the Matter of the Application	)	
Of a Rate Increase for	)	
Raccoon Creek Utility Operating	)	<b><u>Case No. SR-2016-0202</u></b>
Company Inc.	)	

**JOINT LIST OF ISSUES, LIST AND ORDER OF WITNESSES,  
ORDER OF OPENING STATEMENTS AND  
ORDER OF CROSS-EXAMINATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, Office of the Public Counsel and Raccoon Creek Utility Operating Company, Inc., by and through counsel, and in this matter hereby submits the following *List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination*:

**LIST OF ISSUES**

**1. Bad Debt Collection**

What options are available to Raccoon Creek to reduce bad debt in each of its three systems?

**2. Payroll and Benefits**

What amount of corporate payroll and benefits should be included in Raccoon Creek's cost of service?

**3. Rate Design**

- a. Should rate design be based on separate districts or a single tariff?
- b. What customer class or classes should be used to establish rates?

**4. Weighted Average Cost of Capital**

- a. Capital Structure – what is the appropriate debt/equity structure to utilize in determining the Raccoon Creek cost of service?

- b. Return on Equity – what is the appropriate return on equity to utilize in determining the Raccoon Creek cost of service?
- c. Interest – what is the appropriate debt interest rate to utilize in determining the Raccoon Creek cost of service?
- d. Rate of Return - (this will be a fallout of the Commission's weighted cost of capital decision)

**5. Tax and Auditing Fees**

What is the appropriate amount of tax and auditing preparation fees to include in the cost of service for Raccoon Creek and First Round?

**6. Property Taxes**

What is the appropriate amount of property tax to include in the cost of service for each of the systems of Raccoon Creek and First Round?

**7. Corporate Allocation**

What is the proper percentage of corporate allocation to apply to corporate costs?

**8. Rate Case Expense**

What is the appropriate amount of rate case expense to include in the cost of service for Raccoon Creek? What is the appropriate mechanism to apply to rate case expense costs for Raccoon Creek?

**9. Accounting of Accounts 301**

Which invoices are appropriate to include in account 301 (Organizational Costs)?

**Order of Opening Statements**

Company

Staff of the Missouri Public Service Commission (Staff)

Office of the Public Counsel (OPC)

## **List and Order of Witnesses**

**8:30 a.m. Preliminary Matters**

**9:00 a.m. Opening Statements**

**10:00 a.m. Cross-Examination of Witnesses**

### *Company Witnesses:*

Michael E Thaman, Sr.\*

Dylan W. D'Ascendis\*

Phil Kain\*

Josiah Cox

### *Staff Witnesses:*

Natelle Dietrich\*

Curtis Gateley

Brooke Richter

Matthew Barnes

Paul Harrison

Matthew Young

### *OPC Witnesses:*

Keri Roth

James Russo

Charles Hyneman

\* These witnesses need to appear on October 20, 2016.

### **Order of Cross-Examination**

<b>Company's Witnesses</b>	<b>OPC Witnesses</b>	<b>Staff Witnesses</b>
OPC	Company	OPC
Staff	Staff	Company

**WHEREFORE**, Staff prays on behalf of all of the parties herein that the Commission will accept this List of Issues, List and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination; and grant such other and further relief as the Commission considers just in the circumstances.

**/s/ Whitney Payne**

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**/s/ Dean L. Cooper**

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INC.

**/s/ Cydney D. Mayfield**

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OFFICE OF THE PUBLIC COUNSEL

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 14<sup>th</sup> day of October, 2016, to all counsel of record.

**/s/ Whitney Payne**