

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

In the Matter of the Application of Lincoln)
County Sewer & Water, LLC for Approval) **File No. SR-2013-0321**
Of a Rate Increase)

In the Matter of the Application of Lincoln)
County Sewer & Water, LLC for Approval) **File No. WR-2013-0322**
Of a Rate Increase)

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

COME NOW the Staff of the Missouri Public Service Commission (Staff), Lincoln County Sewer & Water, LLC (“Lincoln County”), and the Office of the Public Counsel (“Public Counsel”), by and through counsel, and hereby submit to the Missouri Public Service Commission (Commission) this *Joint List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements*:

Order of Opening Statements

Lincoln County
Staff
Public Counsel

Issues and Witnesses

1. Meters/Meter Reading

- a. What is the appropriate amount, if any, to include in rates for the purchase, installation, and operation and maintenance of the Company’s automated meters?
- b. If the automated meter costs are not included in rates, what amount of non-automated meter purchase, installation, and operation and maintenance costs should be included in rates?
- c. If the automated meter costs are not included in rates, what amount of meter reading costs should be included in rates?

Johansen – Lincoln County
Kallash – Lincoln County¹

¹ Public Counsel disagrees that this witness has filed the required testimony on this issue to allow him to appear as a witness.

Hanneken - Staff
Merciel - Staff
Addo – OPC

2. Billing Program & Billing Expenses

- a. What is the appropriate amount to include in rates for the Company’s billing program?
- b. If the billing program is not included in rates, should additional payroll expenses be included for billing and related activities?

Johansen – Lincoln County
Hanneken – Staff
Addo - OPC

3. Land Ownership and Valuation

- a. Should the value of the land on which the Company’s facilities are situated be included in rate base for the Company?
- b. If so, what is the value of that land?

Johansen – Lincoln County
Kallash – Lincoln County
Addo - OPC
Hanneken – Staff

4. Rate Base

- a. What are the appropriate beginning balances for the Company’s rate base?

Johansen – Lincoln County
Kallash – Lincoln County²
Addo - OPC
Hanneken - Staff

5. Capacity Adjustments (Rockport)

- a. What should be the adjustment to rate base for excess capacity in the Company’s Rockport facilities?

Johansen – Lincoln County
Addo - OPC
Merciel - Staff

² Public Counsel disagrees that this witness has filed the required testimony on this issue to allow him to appear as a witness.

6. Plant Held for Future Use

- a. Should the capacity adjustment to rate base be recorded as plant held for future use?

Johansen – Lincoln County
Addo - OPC
Hanneken – Staff

7. Depreciation Rates

- a. What is the appropriate depreciation rate for the Company’s submersible pumping equipment account on the Bennington system?
- b. Should the Commission order adjustments to the accumulated depreciation for the Bennington submersible pump account?

Johansen – Lincoln County
Rice - Staff
Addo - OPC

8. Rate Case Expense

- a. What is the appropriate amount of rate case expense to include in the Company’s rates?

Johansen – Lincoln County
Hanneken – Staff
Addo - OPC

9. Certificate Case Expense

- a. What is the appropriate amount of costs related the Company’s certificate cases to include in the Company’s rates?

Johansen – Lincoln County
Addo - OPC
Hanneken – Staff

10. Office Rent/Office Utilities

- a. What is the appropriate amount of expense to include in rates for the Company’s office space, including rent and utilities?

Johansen – Lincoln County
Kallash – Lincoln County
Boateng – Staff
Addo - OPC

11. Property/Liability Insurance

- a. What is the appropriate amount of expense to include in rates for property or liability insurance?

Johansen – Lincoln County
Kallash – Lincoln County
Addo - OPC
Hanneken - Staff

12. Income Taxes

- a. Is it appropriate to include income tax expense in the Company's cost of service?

Johansen – Lincoln County
Kallash – Lincoln County
Hanneken - Staff

13. Salaries – Dennis and Toni Kallash

- a. What is the appropriate level of salary to include in rates for Dennis Kallash?
- b. What is the appropriate level of salary to include in rates for Toni Kallash?

Johansen – Lincoln County
Kallash – Lincoln County
Hanneken – Staff
Addo - OPC

14. Mileage

- a. What is the appropriate amount of expense to include in rates for vehicle mileage?

Johansen – Lincoln County
Kallash – Lincoln County³
Hanneken – Staff
Addo - OPC

15. Testing

- a. What is the appropriate amount of expense to include in rates for water testing?

Johansen – Lincoln County
Addo - OPC
Hanneken – Staff

³ Public Counsel disagrees that this witness has filed the required testimony on this issue to allow him to appear as a witness.

16. Sludge Hauling

- a. What is the appropriate amount of expense to include in rates for sludge hauling?

Johansen – Lincoln County
Kallash – Lincoln County
Addo - OPC
Hanneken – Staff

17. Office Supplies and Postage (Mailing of Consumer Confidence Report)

- What is the appropriate amount of expense to include in rates for office supplies and postage in regard to the mailing of the Consumer Confidence Report?

Johansen – Lincoln County
Kallash – Lincoln County
Addo - OPC
Ferguson – Staff

18. Late Fees

- a. What is the appropriate amount of revenue to include in rates for late fees?

Johansen – Lincoln County
Addo - OPC
Ferguson – Staff

19. Telephone and Internet

- What is the appropriate amount of expense to include in rates for telephone and internet usage?

Johansen – Lincoln County
Addo - OPC
Boateng – Staff

20. Electricity Expense (Operations)

- What is the appropriate amount of expense to include in rates for electricity related to the Rockport well and sewage treatment plant?

Johansen – Lincoln County
Addo - OPC
Boateng – Staff

21. EMSU Staff Recommendations

Should the Company continue to implement the recommendations of Staff’s EMSU unit regarding time sheets, vehicle logs, estimation procedures, after-hours availability, and distribution of customer rights information?

Kallash – Lincoln County
Huber (Vieth) – Staff

Order of Cross-Examination

Company Witnesses:	Staff Witnesses:	Public Counsel Witnesses:
Staff	OPC	Staff
OPC	Company	Company

WHEREFORE, Staff, Lincoln County, and Public Counsel hereto tender this *Joint List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements.*

/s/ Amy E. Moore
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of October, 2013.

/s/ Amy E. Moore