Exhibit No.:

Issue(s): Class Cost of Service/

Rate Design

Witness: Keri Roth Sponsoring Party: MoPSC Staff

Type of Exhibit: Surrebuttal Testimony

Case No.: WR-2022-0303

Date Testimony Prepared: February 8, 2023

MISSOURI PUBLIC SERVICE COMMISSION INDUSTRY ANALYSIS DIVISION WATER, SEWER, & STEAM DEPARTMENT

SURREBUTTAL TESTIMONY

OF

KERI ROTH

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WR-2022-0303

Jefferson City, Missouri February 2023

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1		SURREBUTTAL TESTIMONY OF	
2		KERI ROTH	
3		MISSOURI-AMERICAN WATER COMPANY	
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5	Q.	Please state your name and business address.	
6	A.	My name is Keri Roth and my business address is 200 Madison Street, P.O. Box	
7	360, Jefferson City, Missouri 65102.		
8	Q.	By whom are you employed and in what capacity?	
9	A.	I am employed by the Missouri Public Service Commission ("Commission") as	
10	a Senior Research/Data Analyst in the Water, Sewer, & Steam Department, Industry Analysis		
11	Division.		
12	Q.	Are you the same Keri Roth who previously filed direct testimony on	
13	December 16, 2022, and rebuttal testimony on January 25, 2023, in this case?		
14	A.	Yes, I am.	
15	EVECUTIV	E SHMMADV	
		<u>TE SUMMARY</u>	
16	Q.	What is the purpose of your surrebuttal testimony in this case?	
17	A.	The purpose of my surrebuttal testimony is to respond to the rebuttal testimony	
18	of Missouri I	industrial Energy Consumers ("MIEC") witness Jessica A. York regarding Staff's	
19	Factor 4 adjustment in the Staff Class Cost of Service Study ("CCOS") and the location of the		
20	special contracts in Staff's CCOS. I will also respond to Missouri-American Water Company		
21	("MAWC") witness Wesley E. Selinger regarding Staff's Factor 4 adjustment in its CCOS and		
22	public fire and private fire annual usage data.		

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RESPONSE TO MIEC WITNESS JESSICA A. YORK

- Q. Ms. York identified in her rebuttal testimony an error within Staff's Factor 4 in its CCOS.¹ Did Staff correct this error in its rebuttal testimony?
- A. Yes. In my direct testimony, I stated that an adjustment was included in Staff's CCOS for transmission and distribution mains.² However, the calculation was erroneously not included in Factor 4. The error was corrected in my rebuttal testimony.³
- Q. Ms. York stated in her rebuttal testimony that Staff excluded contract customers in its CCOS studies.⁴ Is this true?
- A. No. Staff has included special contract customers in its CCOS studies. The special contracts for the two industrial customers are embedded in the industrial customer revenues, and the special contracts for the three sale for resale customers are embedded in the sale for resale customer revenues in the CCOS studies.

RESPONSE TO MAWC WITNESS WESLEY E. SELINGER

- Q. Mr. Selinger stated in his January 25, 2023, rebuttal testimony that it was not clear in Staff's CCOS workpapers where Staff included an adjustment for transmission and distribution mains.⁵ Has Staff corrected this error?
 - A. Yes. As mentioned above, the error was corrected in my rebuttal testimony.
- Q. Mr. Selinger stated in his January 25, 2023, rebuttal testimony that MAWC does not meter public fire; therefore, annualized gallons are estimated.⁶ However, MAWC does have

¹ Rebuttal Testimony of Jessica A. York, WR-2022-0303. P. 3:19-20.

² Direct Testimony of Keri Roth, WR-2022-0303. P. 8:20-23, P.9:1.3.

³ Rebuttal Testimony of Keri Roth, WR-2022-0303. P. 2:6-9.

⁴ Rebuttal Testimony of Jessica A. York, WR-2022-0303. P. 6:11-12

⁵ Rebuttal Testimony of Wesley E. Selinger, WR-2022-0303. P. 4:16.

⁶ Rebuttal Testimony of Wesley E. Selinger, WR-2022-0303. P. 5:2-3.

Surrebuttal Testimony of Keri Roth

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annualized usage data for private fire in its CCOS studies on the Usage Statistics tabs.⁷ Is Staff

2 concerned about MAWC estimating public fire information?

A. Yes. MAWC's CCOS studies do include total usage for private fire on the Usage Statistics tabs; however, total estimated usage is not included for public fire on the Usage Statistics tabs. It does not appear that estimated gallons have been specifically identified for public fire. Staff proposes MAWC develop a way to show the breakdown of public fire gallons and private fire gallons in its CCOS studies.

- Q. Does this conclude your surrebuttal testimony?
- A. Yes it does.

⁷ Rebuttal Testimony of Wesley E. Selinger, WR-2022-0303. P. 5:3-5.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Missouri-A Company's Request for Aut Implement General Rate Ind and Sewer Service Provided Service Areas	hority to) crease for Water)	Case No. WR-2022-0303
	9	
	AFFIDAVIT OF KERI I	ROTH
- 1		
STATE OF MISSOURI)	,
COUNTY OF COLE) ss.	
	# E 9	
COMES NOW KERI R	OTH and on her oath declare	es that she is of sound mind and lawful
age; that she contributed to the	ne foregoing Surrebuttal Testi	mony of Keri Roth; and that the same is
true and correct according to	her best knowledge and belie	f.
_		9
Further the Affiant sayeth	n not.	
	KERIROTI	Boll
	JURAT	
Subscribed and sworn be	fore me, a duly constituted an	nd authorized Notary Public, in and for
the County of Cole, State of	Missouri, at my office in Jef	ferson City, on this day
of February 2023.	D-	2
~	¹⁰ 20	

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

Deuziellankin Notary Public