

Issue: Rate Design
Witness: Brian C. Collins
Type of Exhibit: Surrebuttal Testimony
Sponsoring Parties: Triumph Foods, LLC
Case Nos.: WR-2022-0303 & SR-2022-0304
Date Testimony Prepared: February 8, 2023

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

_____)
In the Matter of Missouri-American)
Water Company's Request for Authority)
to Implement General Rate Increase for)
Water and Sewer Service Provided in)
Missouri Service Areas.)
_____)

**Case Nos. WR-2022-0303/
SR-2022-0304**

Surrebuttal Testimony

Brian C. Collins

On behalf of

Triumph Foods, LLC

February 8, 2023



Project 11350.1

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Surrebuttal Testimony of Brian C. Collins

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Brian C. Collins. My business address is 16690 Swingley Ridge Road, Suite 140,
3 Chesterfield, MO 63017.

4 **Q ARE YOU THE SAME BRIAN C. COLLINS WHO PREVIOUSLY PRESENTED**
5 **TESTIMONY IN THIS PROCEEDING?**

6 A Yes, I am.

7 **Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

8 A This information was included in Schedule BCC-1 to my rebuttal testimony filed on
9 January 25, 2023.

10 **Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?**

11 A My testimony is presented on behalf of Triumph Foods, LLC ("Triumph Foods").
12 Triumph Foods owns and operates a large pork-processing facility in St. Joseph,
13 Missouri and is the largest industrial consumer of water in Missouri-American Water
14 Company's ("MAWC" or "Company") service territory. Triumph Foods currently

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1 employs approximately 2,500 people with 2,050 of those in production-related positions
2 and 450 holding management and clerical positions.

3 Triumph Foods uses an extraordinary amount of water far in excess of typical
4 industrial water consumers and operates under a special service contract with MAWC
5 (described below) and thus has a vested interest in these proceedings.

6 **Q WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY?**

7 A This surrebuttal testimony will address the Missouri Public Service Commission Staff's
8 and the Office of the Public Counsel's ("OPC") rebuttal testimonies on class cost of
9 service and rate design in regard to the special contract Triumph Foods has with
10 MAWC.

11 **Q HAVE YOU REVIEWED THE REBUTTAL TESTIMONIES OF STAFF AND OPC
12 WITH RESPECT TO THE TRIUMPH FOODS SPECIAL CONTRACT?**

13 A Yes, I have reviewed the rebuttal testimonies. Based on that review, no party has
14 disputed the continuation of the contract or the contract's rate methodology in rebuttal
15 testimony.

16 **Q WHAT IS YOUR RECOMMENDATION?**

17 A As a result of my review of the rebuttal testimonies of Staff and OPC, Triumph Foods'
18 special contract should be continued as recommended in my rebuttal testimony. To
19 the extent the Company's filed revenue requirement or class cost of service study
20 results are adjusted, I would expect that the Triumph Foods rate proposed by the
21 Company will be updated.

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1 Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

2 A Yes, it does.

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