

Exhibit No.: _____
Issue(s): Safe and Adequate Service
Witness/Type of Exhibit: Roth/Supplemental Direct
Sponsoring Party: Public Counsel
Case No.: WC-2016-0252

DIRECT TESTIMONY

OF

KERI ROTH

Submitted on Behalf of the Office of the Public Counsel

MOORE BEND WATER UTILITY, LLC

CASE NO. WC-2016-0252

November 15, 2016

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


The Office of Public Counsel)	
Complainant,)	
)	
vs.)	<u>Case No. WC-2016-0252</u>
)	
Moore Bend Water Utility, LLC,)	
Respondent.)	

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Keri Roth, of lawful age and being first duly sworn, deposes and states:

1. My name is Keri Roth. I am a Public Utility Accountant III for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my supplemental direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.




Keri Roth
Public Utility Accountant III

Subscribed and sworn to me this 15th day of November 2016.



JERENE A. BUCKMAN
My Commission Expires
August 23, 2017
Cole County
Commission #13754037



Jerene A. Buckman
Notary Public

My Commission expires August 23, 2017.

SUPPLEMENTAL DIRECT TESTIMONY

OF

KERI ROTH

MOORE BEND WATER UTILITY, LLC

CASE NO. WC-2016-0252

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. Keri Roth, P.O. Box 2230, Jefferson City, Missouri 65102-2230.

4 **Q. Are you the same Keri Roth who has filed direct testimony in this case?**

5 A. Yes.

6 **Q. In your direct testimony, did you state that OPC has sent additional data requests to**
7 **Moore Bend and would provide supplemental testimony at a later time?**

8 A. Yes.

9 **Q. Has Moore Bend provided a response to your data request?**

10 A. Yes, please see Schedule KNR-1.

11 **Q. In your direct testimony you stated that OPC was not a signatory to the**
12 **Company/Staff Disposition Agreement in Case No. WR-2015-0192, because salaries**
13 **for three employees who had not yet been hired were included in rates. You also**
14 **stated that OPC was certain two of the positions are not currently filled. Have you**
15 **since received additional information disputing this statement?**

16 A. Yes. Based on Moore Bend's response to OPC Data Request #1100 received after direct
17 testimony was filed, Moore Bend does employ a full-time certified operator. Moore Bend
18 also employs an additional part-time customer service representative ("CSR"). However,
19 Moore Bend does not employ a full-time assistant certified operator.

1 **Q. Was the additional position for a CSR included in rates meant to be full-time or part-**
2 **time in Case No. WR-2015-0192?**

3 A. Employee wages were included in rates for a full-time position. Moore Bend is employing
4 this position as part-time.

5 **Q. What is OPC's concern with the full-time operator currently employed by Moore**
6 **Bend?**

7 A. Through discussions with Missouri Department of Natural Resources ("MODNR"), OPC
8 understands that an operator for Moore Bend must be DS-II or DS-III certified in order to be
9 compliant with MODNR regulations. The operator currently employed by Moore Bend is
10 only DS-I certified. Therefore, until Moore Bend hires an operator with the appropriate
11 certification, MODNR will not remove the Boil Water Order on Moore Bend. While this is
12 the primary concern of the OPC in this matter, the reality is Moore Bend has not hired
13 anyone qualified to actually run this system. If they do not meet the required DNR
14 standards, the person employed cannot run the system and provide a safe, adequate water
15 supply.

16 **Q. Based on Moore Bend's response to OPC Data Request #1100, does OPC believe**
17 **employee wages are being used appropriately to benefit rate payers?**

18 A. No. Moore Bend continues to have one vacant position, the CSR is only employed part-
19 time, and the current certified operator does not have the appropriate certification to operate
20 Moore Bend. Based on this information, it is possible that Moore Bend is over-earning.

21 **Q. Does this conclude your supplemental direct testimony?**

22 A. Yes.

**RESPONSE TO OPC DATA REQUEST 1100
MOORE BEND WATER UTILITY, LLC**

1100. Please provide a list of all current Ozark International, Inc., employees. For each employee please include:

- i. Job title
- ii. Annual salary and/or hourly wage
- iii. Full-time or part-time status

RESPONSE:

The employees of Ozark International, Inc., are as follows:

Hollis H. Brower, Jr.	Manager	\$1,000/week	Full-time
Connie Long	Bookkeeper-Customer Service	\$15/hour	Part-time
Donnaleen Alexander	Customer Service	\$10/hour	Part-time
Abby Long	Customer Service	\$10/hour	Part-time
Cheryl Brower	Customer Service-Payment Service	\$10/hour	Part-time
Valerie Guerin	Meter Reader	\$11/hour	Part-time
Jeff Colboch	Operator	\$13.50/hour	Full-time