

Exhibit No.:
Issue(s):
Witness/Type of Exhibit:
Sponsoring Party:
Case No.:

General
Robertson
Public Counsel
WO-2014-0340

REBUTTAL TESTIMONY

OF

TED ROBERTSON

Submitted on Behalf of the Office of the Public Counsel

**BRANDCO INVESTMENTS, LLC AND
HILLCREST UTILITY OPERATING COMPANY, INC.**

CASE NO. WO-2014-0340

**

**

Denotes Highly Confidential or Proprietary Information that has been redacted

October 3, 2014

NP

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

In the Matter of the Joint Application of)	
Brandco Investments, LLC and)	
Hillcrest Utility Operating Company,)	
Inc., for Hillcrest to Acquire Certain)	Case No. WO-2014-0340
Water and Sewer Assets of Brandco)	
and, In Connection Therewith, Issue)	
Indebtedness and Encumber Assets)	

AFFIDAVIT OF TED ROBERTSON


STATE OF MISSOURI)
) ss
 COUNTY OF COLE)

Ted Robertson, of lawful age and being first duly sworn, deposes and states:

1. My name is Ted Robertson. I am the Chief Public Utility Accountant for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my rebuttal 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.




 Ted Robertson, C.P.A.
 Chief Public Utility Accountant

Subscribed and sworn to me this 3rd day of October 2014.



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



 Jerene A. Buckman
 Notary Public

My Commission expires August 23, 2017.

1 REBUTTAL TESTIMONY
2 OF
3 TED ROBERTSON
4

5 HILLCREST UTILITY OPERATING COMPANY, INC.
6 CASE NO. WO-2014-0340, ET AL.
7
8

9 I. INTRODUCTION

10 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

11 A. Ted Robertson, PO Box 2230, Jefferson City, Missouri 65102-2230.
12

13 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

14 A. I am employed by the Missouri Office of the Public Counsel ("OPC" or "Public Counsel")
15 as the Chief Public Utility Accountant.
16

17 Q. WHAT IS THE NATURE OF YOUR CURRENT DUTIES AT THE OPC?

18 A. My duties include all activities associated with the supervision and operation of the
19 regulatory accounting section of the OPC. I am also responsible for performing audits
20 and examinations of the books and records of public utilities operating within the state of
21 Missouri.
22

23 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND OTHER
24 QUALIFICATIONS.

25 A. I graduated in May, 1988, from Missouri State University in Springfield, Missouri, with a
26 Bachelor of Science Degree in Accounting. In November of 1988, I passed the Uniform

1 Certified Public Accountant Examination, and I obtained Certified Public Accountant
2 ("CPA") certification from the state of Missouri in 1989. My CPA license number is
3 2004012798.
4

5 Q. HAVE YOU RECEIVED SPECIALIZED TRAINING RELATED TO PUBLIC
6 UTILITY ACCOUNTING?

7 A. Yes. In addition to being employed by the Missouri Office of the Public Counsel since
8 July 1990, I have attended the NARUC Annual Regulatory Studies Program at Michigan
9 State University, and I have also participated in numerous training seminars relating to
10 this specific area of accounting study.
11

12 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE MISSOURI PUBLIC
13 SERVICE COMMISSION ("COMMISSION" OR "MPSC")?

14 A. Yes, I have testified on numerous issues before this Commission. Please refer to
15 Schedule TJR-1, attached to this testimony, for a listing of cases in which I have
16 submitted testimony.
17

18 II. PURPOSE OF TESTIMONY

19 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

1 A. The purpose of this rebuttal testimony is to address the Public Counsel's positions
2 regarding the requests before the Commission in this case.

3
4 Q. PLEASE CONTINUE.

5 A. On May 13, 2014, Brandco Investments, LLC ("Brandco") and Hillcrest Utility Operating
6 Company, Inc. ("Hillcrest") filed a *Joint Application and, if Necessary, Motion for*
7 *Waiver* ("Application") in which they seek authorization of the Missouri Public Service
8 Commission for Hillcrest's agreement to purchase Brandco's water and sewer assets, to
9 grant Hillcrest a certificate of convenience and necessity to own and operate those water
10 and sewer assets and to grant Hillcrest authority to issue up to \$1,000,000 of secured
11 indebtedness. The described purpose of the secured indebtedness is to for the purchase of
12 the assets and to fund construction necessary to bring the systems into regulatory
13 compliance. The Commission assigned Case Nos. WO-2014-0340 and SO-2014-341 to
14 the Application. Subsequently, the Commission consolidated the two cases with its,
15 Order Granting Motion To Consolidate, Case No. SO-2014-0341, effective July 18, 2014,
16 with Case No. WO-2014-0340 authorized as the lead file.

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18 Q. WHAT SPECIFICALLY ARE THE COMPANIES REQUESTING FROM THE
19 COMMISSION?

20 A. Beginning on page eight of the Application it states:

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WHEREFORE, Hillcrest and Brandco respectfully request that the Commission issue its order:

(A) Authorizing Brandco to sell, and Hillcrest to acquire, the assets of Brandco identified herein, to include the certificates held by Brandco or, in the alternative grant Hillcrest new certificates to provide water and sewer service in the areas now served by Brandco;

(B) Authorizing Hillcrest to enter into, execute and perform in accordance with the terms described in the Agreement attached to this Joint Application and to take any and all other actions which may be reasonably necessary and incidental to the performance of the acquisition;

(C) Authorizing Hillcrest to enter into, execute and deliver loan agreements with Fresh Start Ventures LLC to incur indebtedness, provided that the aggregated principle amount of all such debt obligations shall not exceed \$1,000,000, pursuant to the terms identified herein;

(D) Authorizing Hillcrest to create and make effective a first lien on all of the franchises, certificates of convenience and necessity, plant and system of Hillcrest, to secure its obligations under the loan as provided herein;

(E) Authorizing Hillcrest to enter into, execute, deliver and perform the necessary promissory notes, loan agreements and other documents necessary to effectuate the described financing transactions; and,

(F) Granting such other relief as may be deemed necessary and appropriate to accomplish the purposes of the Agreement and the Joint Application and to consummate related transactions in accordance with the Agreement.

Q. IS HILLCREST PROPOSING TO USE BRANDCO'S CURRENT RATES, RULES,
AND REGULATIONS?

1 A. Yes. On page six of the Application it states:
2

3 Hillcrest proposes to utilize the Brandco rates, rules and regulations and
4 other tariffs currently on file with, and approved by, the Commission as
5 Brandco's P.S.C. Mo. No. 2 water tariff and Brandco P. S.C. Mo. No. 2
6 sewer tariff until such time as they may be modified according to law.
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9 Q. WHAT IS THE PURCHASE PRICE BEING PAID FOR THE WATER AND SEWER
10 OPERATIONS?

11 A. On page three of the ** **
12 ("Agreement"), dated ** **, it identifies the purchase price as:
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23 In addition, Hillcrest's response to OPC DR No. 1004 provides a proprietary work paper
24 which corroborates the purchase price; however, the portion of the response that is not
25 proprietary states, "Hillcrest is attempting to purchase this utility for net book value."
26

1 Q. DID THE COMPANY LATER PROVIDE A REVISED NET BOOK VALUE FOR THE
2 PURCHASE PRICE?

3 A. Yes. Hillcrest's highly confidential response to OPC DR No. 1024 provided a revised **
4 **.

5
6 Q. WHAT IS THE ACTUAL NET BOOK VALUE OF THE BRANDCO OPERATIONS?

7 A. Attachment A, *Accounting Unit Plant-in-Service Balances*, included in the Commission
8 Staff's Memorandum, attached as Appendix A to Staff's *Recommendation to*
9 *Conditionally Approve the Transfer of Asset, and Issuance of a Certificate of*
10 *Convenience and Necessity*, filed in Case No. WO-2014-0340 on August 26, 201,
11 identifies that the water and sewer operations combined have a net rate base of \$82,283
12 (i.e., water -\$33,164 and sewer - \$49,119).

13
14 Q. WILL THE STATED AND/OR REVISED ESTIMATED PURCHASE PRICE RESULT
15 IN AN ACQUISITION DISCOUNT TO THE NET BOOK VALUE OF BRANDCO?

16 A. Yes, if the amount actually paid is less than the actual net book value; however, it is my
17 understanding that Hillcrest intends that the purchase price paid will equal the actual net
18 book value.
19

1 Q. DID PUBLIC COUNSEL UNDERTAKE AN INVESTIGATION OF BRANDCO AND
2 HILLCREST AS IT PERTAINS TO THEIR REQUESTS BEFORE THE
3 COMMISSION?

4 A. Yes. Given the unusual nature of the proposed financing and the fact that the purchaser,
5 Hillcrest (OPC DR No. 1003 – Hillcrest was formed on or about February 14, 2014 as an
6 operating subsidiary of Central States Water Resources, Inc. ("CSWR")) and its owners
7 (i.e., Mr. Josiah Cox, Mr. Thomas H. Manz and Mr. Walter R. ("Ross") Kersey III), have
8 little to no experience in the management and operation of a regulated utility company
9 within the state of Missouri, Public Counsel did undertake a detailed investigation of both
10 Brandco and Hillcrest and their requests before the Commission.

11
12 Q. PLEASE CONTINUE.

13 A. Public Counsel, in addition to attending and participating in several meetings and
14 conference calls with the parties to obtain information and discuss the various aspects of
15 the case, also issued thirty-two (32) data requests to Hillcrest seeking to understand and
16 evaluate, among other items, the structure and terms of the proposed financing, the parties
17 to the proposed financing, the utilization of the proposed financing funds, the current
18 operations of Brandco, including its asset base and any operating violations, and the
19 operation of Hillcrest going-forward should the Commission authorize the purchase.

20

1 Q. WHY ARE THE BRANDCO OPERATIONS UP FOR SALE?

2 A. It is my understanding that the water and sewer operations have a number of operational
3 and financial issues and that the current owner no longer has adequate ability to
4 accomplish operations tasks, and also has limited financial resources with which to
5 correct deficiencies.

6
7 Q. WHAT ARE THE OPERATIONAL ISSUES?

8 A. Beginning on page seven of the direct testimony of Josiah Cox, President of Hillcrest, he
9 describes water operation issues such as multiple boil orders, a temporary chlorination
10 system requiring placement, and no backup power or twenty-four hour drinking water
11 storage. He also discusses sewer issues such as ongoing sanitary sewer over flows, the
12 wastewater treatment plant is not operational as the blowers are no longer functioning,
13 and basic maintenance seems to not be taking place. He also adds that operational
14 records and state minimum Missouri Department of Natural Resources testing submittals
15 are non-existent.

16
17 Q. DID THE MPSC STAFF DISCUSS THESE ISSUES IN ITS *RECOMMENDATION TO*
18 *CONDITIONALLY APPROVE THE TRANSFER OF ASSETS, AND ISSUANCE OF A*
19 *CERTIFICATE OF CONVENIENCE AND NECESSITY* FILED IN THE INSTANT
20 CASE ON AUGUST 26, 2014?

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1 A. Yes. The MPSC Staff discussed the aforementioned issues and more in its Appendix A
2 attached to the recommendation.

3
4 Q. IS HILLCREST CURRENTLY SUBJECT TO THE JURISDICTION AND
5 SUPERVISION OF THE COMMISSION?

6 A. No. Hillcrest was recently formed for the purpose of providing water and sewer service
7 to the public in the areas currently served by Brandco.

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9 Q. WHO OWNS AND MANAGES HILLCREST?

10 A. Hillcrest's proprietary response to OPC DR No. 1009 states:

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23 Essentially, according to Hillcrest's highly confidential response to MPSC Staff DR No.

24 8, Hillcrest is **

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Q. WHO ARE THE OWNERS OF CENTRAL STATES WATER RESOURCES, INC.?

A. Hillcrest's proprietary response to OPC DR No. 1022 states:

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The response to OPC DR No. 1022 is corroborated by the Hillcrest response to OPC DR No. 1005 which states that Mr. Thomas J. Manz is an officer (the Treasurer) of Central States Water Resources, Inc.

Q. WHO ARE THOMAS J. MANZ AND WALTER R. KERSEY III?

A. It is my understanding, that Thomas Manz and Ross Kersey are businessmen/investors that were identified by an investment banker that Josiah Cox was working with to obtain financing for his "vision" of consolidating small utilities within the state of Missouri. Further, Thomas Manz and Ross Kersey invested in CSWR and assisted in obtaining other investors to fund the Fresh Start Ventures LLC Term Loan. Hillcrest's proprietary response to OPC DR No. 1022 states that:

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4 **

7 Q. DOES JOSIAH COX, THOMAS MANZ OR WALTER KERSEY III HAVE ANY
8 EXPERIENCE IN MANAGING AND OPERATING A COMMISSION REGULATED
9 PUBLIC UTILITY IN THE STATE OF MISSOURI?

10 A. No. To my knowledge, neither Thomas Manz or Walter Kersey III have any knowledge
11 or experience in managing or operating a regulated public utility within the state of
12 Missouri or anywhere else. Whereas, Josiah Cox, while he has not managed or operated
13 a Commission regulated public utility, does have some knowledge and experience in the
14 field. Company's response to OPC DR No. 1010 states:

15
16 As President of Central States Water Resources, Inc., (CSWR) I have
17 extensive past and present experience with rural communities in every
18 facet of the water and wastewater compliance process including
19 environmental assessment, permitting, design, construction, operation and
20 community administration of the actual water and wastewater (sewerage)
21 systems. I have performed stream sampling and built waste-load
22 allocation models to determine receiving water-body protective permit-
23 able effluent pollutant loads. I have done full engineering design of
24 multiple whole community wastewater and water infrastructure systems
25 including wells, water distribution, water treatment, water storage,
26 wastewater conveyance, and wastewater treatment plants and taken these
27 designs through federal and state administered permitting processes in
28 Missouri.
29

1 I have administered the construction of these water and wastewater
2 systems from green field site selection all the way through system startup
3 and final engineering sign off. I currently operate a system including the
4 actual management of its functioning, testing, and maintenance of said
5 system. Additionally, I also act as the administrator for this municipal
6 system performing all the billing, emergency response, accounts
7 payable/accounts receivable, collections, budgeting, customer service, and
8 public town meetings required to service this community.
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10

11 In addition, beginning on line 1, page 3, of his direct testimony, Josiah Cox states that in
12 2008, he took over the operations on an existing rural sewer district and still currently
13 operates a system actually managing the functioning, testing, and maintenance of the
14 system. He also acts as the administrator for a municipal system performing all the
15 billing, emergency response, accounts payable/accounts receivable, collections,
16 budgeting, customer service, and public town meetings required to service the
17 community. Thus, while Josiah Cox appears to have some knowledge and experience in
18 design, construction and Missouri Department of Natural Resources requirements for
19 utility systems, along with management of a municipal system, he has no experience
20 operating and managing a Commission regulated public utility.
21

22 Q. DOES PUBLIC COUNSEL BELIEVE THAT JOSIAH COX HAS THE MANAGERIAL
23 AND TECHNICAL CAPACITY TO MANAGE AND OPERATE THE UTILITY
24 SYSTEMS?

1 A. Yes, but with limitations. According to Josiah Cox's direct testimony he has a Bachelor
2 of Science in Environmental Science from the University of Kansas and a Master's of
3 Business Administration from Washington University in St. Louis. In addition, for two
4 and a half years he was employed by Fribis Engineering, a Civil Engineering Firm in
5 Arnold MO., and also worked at Trumpet LLC a civil engineering, environmental
6 consulting, general contracting, and construction management firm he himself formed.

7
8 Josiah Cox certainly has had some management training and achieved some experience
9 along with having some technical expertise in the field, but he has little, if any,
10 experience in the operation a Commission regulated public utility company. This
11 regulatory knowledge/experience limitation forms the basis for one of Public Counsel's
12 recommendations which I will discuss in detail later. However, with that said, it is my
13 understanding the Mr. Cox also intends to utilize outside contractors for nearly all of the
14 operational aspects of the two utilities (e.g., contract operator, contract billing agent,
15 emergency answering service, etc.) thus, with his identified education, training and
16 experience I believe he has a fundamental level of management and technical capacity
17 that would support his instant case request.

18
19 Q. DOES PUBLIC COUNSEL BELIEVE THAT HILLCREST HAS THE FINANCIAL
20 CAPACITY TO MANAGE AND OPERATE THE UTILITY SYSTEMS?

1 A. Yes.

2
3 Q. HOW DOES HILLCREST PROPOSE TO FINANCE THE PURCHASE AND FUTURE
4 CONSTRUCTION?

5 A. The Application, beginning on page seven, states that Hillcrest intends to execute a Term
6 Loan with Fresh Start Ventures LLC. The Term Loan will be based on monthly principal
7 and interest payments amortized over 10 to 20 years, and the loan will result in a first lien
8 on substantially all of the properties acquired by Hillcrest, including its Certificates of
9 Convenience and Necessity. Consequently, the loan obligations will be secured by a lien
10 or encumbrance on Hillcrest's utility franchises, plant and system that are used to provide
11 service to its customers, and also by an encumbrance against any additional plant and
12 assets. Appendix H-HC to the Application identified the Term Loan commitment with an
13 original interest rate of ** ** for the loan. The Term Loan commitment was later
14 modified to that shown in the direct testimony of Josiah Cox, Schedule JC-3HC. The
15 new Term Loan commitment differs from the Application's original in that the term is
16 now, **

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1 The Term Loan is intended to finance the purchase of Brandco and to finance
2 improvements. In addition, Hillcrest's response to OPC DR No. 1011 states, in part:

3
4 Central States Water Resources, Inc. has an additional \$50,000 of equity
5 for capital expenditures available for Hillcrest and an existing two million
6 dollar credit facility to support further operations or improvements over
7 the next 2 to 5 year period, if needed.
8
9

10 Q. DOES PUBLIC COUNSEL BELIEVE THE PROPOSED FINANCING TO BE
11 UNUSUAL?

12 A. Yes. Fresh Start Ventures LLC is not a normal financial institution, such as a bank, that a
13 small water or sewer operation would normally obtain a loan from. To my knowledge,
14 Fresh Start Ventures LLC is not regulated by any governmental body or agency that
15 normally governs banks, savings and loans, etc. In fact, the proposed lender, Fresh Start
16 Ventures LLC, is actually a new Nevada-based limited liability company created solely to
17 obtain investors for the proposed transaction. In turn Fresh Start Ventures LLC is
18 managed by another new Nevada based corporation named Nem-Fin Corp. Both Fresh
19 Start Ventures LLC and Nem-Fin Corp are identified as managed by Janis M. Pollo a
20 business associate of Thomas Manz. Hillcrest's response to OPC DR No. 1030 states:

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22 It is my understanding that Jan Pollo and Tom Manz have worked together
23 in multiple business ventures, the specifics of which I am not familiar
24 with.

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Q. DOES PUBLIC COUNSEL HAVE CONCERNS WITH THE PROPOSED FINANCING?

A. Yes. Public Counsel has a number of concerns with the proposed financing given its unusual nature. Utilization of venture capital to finance regulated public utilities in the state of Missouri creates a situation that is likely very rare, and to my knowledge, unknown. Numerous questions arise as to the legal and regulatory ramifications that might occur in the event that the utility cannot settle its debts obligations as contracted. For example, in the event of a default who will take ownership of the assets, who specifically are those owners, and are they capable of operating a utility. Public Counsel does not know the answers to these questions, but is greatly concerned that the proposed financing, as currently structured, could be detrimental to the utility, and to the public.

In addition, the requirements of the Term Loan commitment, if finalized as identified, contain an extremely high debt cost rate. To my knowledge, I have never seen a similar debt cost rate as high as the one proposed by the buyer in this case. The buyer has indicated that it could not obtain financing at a lower rate so it is reasonable. Public Counsel believes that the debt cost rate identified is not reasonable and is in fact

1 unprecedented and should not be authorized for recovery from ratepayers at the level
2 identified.

3
4 Q. DOES PUBLIC COUNSEL BELIEVE THAT THE TRANSFER IS DETRIMENTAL
5 TO THE PUBLIC INTEREST?

6 A. No, but with qualifications. As I mentioned earlier, the unusual nature of the financing
7 proposed by the buyer along with its owners lack of knowledge and experience operating
8 a regulated public utility company suggests that the Commission should move cautiously
9 in authorizing the requests sought in this case.

10
11 Q. ARE THERE CONDITIONS YOU RECOMMEND THAT WOULD ENSURE THAT
12 THE TRANSFER IS NOT DETERMINTAL TO THE PUBLIC?

13 A. Yes. First and foremost, I recommend that except for the determination of net rate base
14 for the individual water and sewer operations no other ratemaking authorization be
15 granted in this case. Also, during the case investigation, the parties learned that CSWR
16 has expressed interest in acquiring many other regulated water and sewer systems. On
17 page six of the MPSC Staff *Memorandum*, attached as Appendix A to the MPSC Staff's
18 *Recommendation to Conditionally Approve the Transfer of Assets, and Issuance of a*
19 *Certificate of Convenience and Necessity*, it states, **

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** Continuing, ** ** , Raccoon Creek Utility

Operating Company, Inc. (Raccoon Creek), filed an Application on July 14, 2014, (Case No. SM-2015-0014) seeking authority to acquire and encumber the assets of West 16th Street Sewer Company, W.P.C Sewer Company and Village Water and Sewer Company. Raccoon Creek's proposed financing arrangement in Case No. SM-2015-0014 is based on the same terms from the same lender, Fresh Start Ventures LLC , as proposed in this case.

Public Counsel is extremely concerned about CSWR's interest and/or plans to acquire many more small water and sewer systems given its unusual financing sources and its lack of knowledge and experience managing and operating a Commission regulated public utility company. Public Counsel recommends that the Commission not entertain any additional acquisitions or mergers by Mr. Cox and/or his group of affiliates until such time as they have had the opportunity to go through a least one full rate case cycle for the Brandco operations and those operations identified in Case No. SM-2015-0014. Public Counsel believes this recommendation would allow Mr. Cox and his group time to learn and adjust to the nuances' of the regulated public utility industry, and would also create a historical record or base upon which the Commission, its Staff and the OPC could rely to

1 measure the new owners alleged versus actual capabilities and performance. This last
2 point is very important because according to Hillcrest's response to MPSC Staff DR No.
3 22, "All of the operations staff are by third party contract. Hillcrest will not have any
4 operations staff. " The fact that Hillcrest is going to hire outside contractors to run most,
5 if not all, operations of the utility causes Public Counsel great concern on the attainment
6 of effective and efficient future operations.

7
8 Q. WHAT IS PUBLIC COUNSEL'S RECOMMENDATION?

9 A. Public Counsel recommends that the Commission authorize the purchase of Brandco's
10 water and sewer operations by Hillcrest, and that the current Brandco CC&N either be
11 transferred to Hillcrest or a new one provided. Further, Public Counsel recommends that
12 the Commission authorize all other conditions as listed in the MPSC Staff's August 26,
13 2014 *Recommendation to Conditionally Approve the Transfer of Assets, and Issuance of*
14 *a Certificate of Convenience and Necessity*. However, Public Counsel also recommends
15 that the Commission specifically describe in its authorization order that no ratemaking of
16 any kind for the proposed financing or future construction or operations of Hillcrest,
17 except for the identification of the July 31, 2014 net rate base for both the water and
18 sewer operations, is either implicitly or explicitly authorized in this case. Lastly, Public
19 Counsel recommends that the Commission order Josiah Cox and his group of affiliates
20 not to enter into or request of the Commission authorization of any additional acquisitions

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1 | or mergers of small water or sewer operations in this State until they have completed one
2 | full rate case cycle for the operations being contemplated in the instant case and that of
3 | Case No. SM-2015-0014.

4 |

5 | Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

6 | A. Yes, it does.

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
Missouri Public Service Company	GR-90-198
United Telephone Company of Missouri	TR-90-273
Choctaw Telephone Company	TR-91-86
Missouri Cities Water Company	WR-91-172
United Cities Gas Company	GR-91-249
St. Louis County Water Company	WR-91-361
Missouri Cities Water Company	WR-92-207
Imperial Utility Corporation	SR-92-290
Expanded Calling Scopes	TO-92-306
United Cities Gas Company	GR-93-47
Missouri Public Service Company	GR-93-172
Southwestern Bell Telephone Company	TO-93-192
Missouri-American Water Company	WR-93-212
Southwestern Bell Telephone Company	TC-93-224
Imperial Utility Corporation	SR-94-16
St. Joseph Light & Power Company	ER-94-163
Raytown Water Company	WR-94-211
Capital City Water Company	WR-94-297
Raytown Water Company	WR-94-300
St. Louis County Water Company	WR-95-145
United Cities Gas Company	GR-95-160
Missouri-American Water Company	WR-95-205
Laclede Gas Company	GR-96-193
Imperial Utility Corporation	SC-96-427
Missouri Gas Energy	GR-96-285
Union Electric Company	EO-96-14
Union Electric Company	EM-96-149
Missouri-American Water Company	WR-97-237
St. Louis County Water Company	WR-97-382
Union Electric Company	GR-97-393
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GR-98-374
United Water Missouri Inc.	WR-99-326
Laclede Gas Company	GR-99-315
Missouri Gas Energy	GO-99-258
Missouri-American Water Company	WM-2000-222
Atmos Energy Corporation	WM-2000-312
UtiliCorp/St. Joseph Merger	EM-2000-292
UtiliCorp/Empire Merger	EM-2000-369
Union Electric Company	GR-2000-512
St. Louis County Water Company	WR-2000-844
Missouri Gas Energy	GR-2001-292

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
UtiliCorp United, Inc.	ER-2001-672
Union Electric Company	EC-2002-1
Empire District Electric Company	ER-2002-424
Missouri Gas Energy	GM-2003-0238
Aquila Inc.	EF-2003-0465
Aquila Inc.	ER-2004-0034
Empire District Electric Company	ER-2004-0570
Aquila Inc.	EO-2005-0156
Aquila, Inc.	ER-2005-0436
Hickory Hills Water & Sewer Company	WR-2006-0250
Empire District Electric Company	ER-2006-0315
Central Jefferson County Utilities	WC-2007-0038
Missouri Gas Energy	GR-2006-0422
Central Jefferson County Utilities	SO-2007-0071
Aquila, Inc.	ER-2007-0004
Laclede Gas Company	GR-2007-0208
Kansas City Power & Light Company	ER-2007-0291
Missouri Gas Utility, Inc.	GR-2008-0060
Empire District Electric Company	ER-2008-0093
Missouri Gas Energy	GU-2007-0480
Stoddard County Sewer Company	SO-2008-0289
Missouri-American Water Company	WR-2008-0311
Union Electric Company	ER-2008-0318
Aquila, Inc., d/b/a KCPL GMOC	ER-2009-0090
Missouri Gas Energy	GR-2009-0355
Empire District Gas Company	GR-2009-0434
Lake Region Water & Sewer Company	SR-2010-0110
Lake Region Water & Sewer Company	WR-2010-0111
Missouri-American Water Company	WR-2010-0131
Kansas City Power & Light Company	ER-2010-0355
Kansas City Power & Light Company	ER-2010-0356
Timber Creek Sewer Company	SR-2010-0320
Empire District Electric Company	ER-2011-0004
Union Electric Company, d/b/a AmerenUE	ER-2011-0028
Missouri-American Water Company	WR-2011-0337
Union Electric Company, d/b/a AmerenMO	EU-2012-0027
Missouri-American Water Company	WA-2012-0066
Union Electric Company, d/b/a AmerenMO	ER-2012-0166
Laclede Gas Company	GO-2012-0363
Kansas City Power & Light Company	ER-2012-0174
Kansas City Power & Light Company GMOC	ER-2012-0175
Empire District Electric Company	ER-2012-0345

**CASE PARTICIPATION
OF
TED ROBERTSON**

Company Name	Case No.
Emerald Pointe Utility Company, Inc.	SR-2013-0016
Liberty Utilities	GO-2014-0006
Lincoln County Sewer & Water, LLC	SR-2013-0321
Lincoln County Sewer & Water, LLC	WR-2013-0322
Lake Region Water & Sewer Company	WR-2013-0461
Missouri Gas Energy	GR-2014-0007
Peaceful Valley Service Company	SR-2014-0153
Peaceful Valley Service Company	WR-2014-0154
Hillcrest Utility Operating Company, Inc.	WO-2014-0340