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December 5, 2003

FILED

DEC 05 2003

Missouri Public Service Commission

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Case No. WR-2003-0500

Dear Judge Roberts:

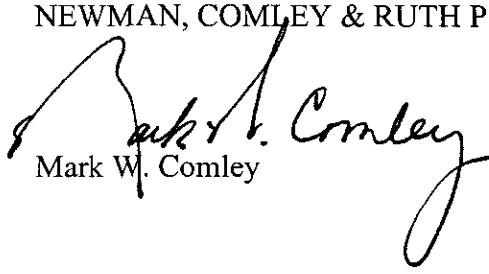
Enclosed for filing in the referenced matter please find the original and five copies of the Surrebuttal Testimony of Robert F. Rennick and Dennis Horn.

Thank you very much for your attention.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley

MWC:ab

Enclosure

cc: General Counsel's Office  
Office of Public Counsel  
Nathan M. Nickolaus  
All parties of record

Exhibit No. :  
Witness : DENNIS HORN  
Type of Exhibit : Surrebuttal Testimony  
Party : CITY OF JEFFERSON  
Case No. : WR-2003-0500  
Issue : Fire Suppression

FILED

DEC 05 2003

Missouri Fire  
Service Commission

CITY OF JEFFERSON

Case No. WR-2003-0500

SURREBUTTAL TESTIMONY

OF

DENNIS HORN

Jefferson City, Missouri  
December 4, 2003

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI


In the Matter of Missouri-American Water Company's     )  
Tariff to Revise Water and Sewer Rate Schedules     )     Case No. WR-2003-0500

AFFIDAVIT OF DENNIS HORN

STATE OF MISSOURI     )  
                                      ) ss.  
COUNTY OF COLE )

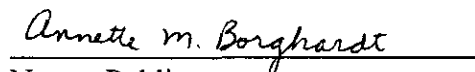
I, DENNIS HORN, of lawful age, being duly sworn, do hereby depose and state:

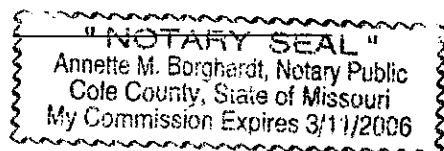
1. My name is DENNIS HORN. I am an Assistant Fire Chief for the Jefferson City Fire Department.
2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

  
Dennis Horn

Subscribed and sworn to before me, a Notary Public, this 4<sup>th</sup> day of December, 2003.

My Commission expires:

  
Notary Public



1  
2  
3 **DIRECT TESTIMONY**  
4

5 Q. WHAT IS YOUR NAME, TITLE AND BUSINESS ADDRESS?

6 A. My name is Dennis Horn and I am an Assistant Fire Chief for the Jefferson City Fire  
7 Department. My office is located at Jefferson City Fire Station No. 1, 621 West High Street  
8 (the corner of Bolivar and High), Jefferson City, Missouri.  
9

10 Q. HOW LONG HAVE YOU BEEN A FIREMAN WITH THE JEFFERSON CITY FIRE  
11 DEPARTMENT?

12 A. Thirty-one years.  
13

14 Q. HOW LONG HAVE YOU SERVED AS AN ASSISTANT FIRE CHIEF?

15 A. Eight years.  
16

17 Q. ON WHOSE BEHALF DO YOU APPEAR IN THIS PROCEEDING?

18 A. The City of Jefferson.  
19

20 Q. WHAT ARE YOUR RESPONSIBILITIES AS ASSISTANT FIRE CHIEF?

21 A. I am in charge of one of the three fire crew shifts that are on duty for the Jefferson City Fire  
22 Department. For the Department generally, I administer payroll, approve duty assignments,  
23 manage emergency activity that occurs on any shift and am responsible for maintenance of  
24 the major pieces of fire fighting equipment.  
25

26 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

27 A. The purpose of my testimony is to respond to Company witness, Mr. Frank Kartmann's  
28 Rebuttal testimony filed in this matter on or about November 10, 2003, particularly regarding  
29 the loss of pressure experienced at our fire stations in September of this year.  
30

31 Q. MR. KARTMANN TESTIFIES ON PAGE 7 THROUGH 8 OF HIS TESTIMONY THAT

1 THE COMPANY HAS NO RECORDS OR EMPLOYEE RECOLLECTIONS OF A  
2 POWER LOSS OR WATER PRESSURE ISSUE ON SEPTEMBER 7, 2003? WERE YOU  
3 ON DUTY ON THAT DATE?

4 A. Yes, I was. Because of Mr. Kartmann's testimony, Chief Rennick and I checked again with  
5 each other respecting our recollection of the events on Sunday, September 7, 2003. I did not  
6 prepare a written record of the events that evening, but it is the best of my recollection that  
7 in the late evening on September 7, 2003, there was a loss of water pressure in the  
8 Company's distribution system.

9  
10 Q. WHAT HAPPENED WHILE YOU WERE ON DUTY THAT EVENING?

11 A. At about 9:00 p.m., I received a telephone call from Captain Steve Braun who reported that  
12 there was a loss of water pressure at Station No. 4, located at 820 Ellis. From my post at  
13 Station 1, I called the other stations to check on conditions there. Station No. 3 had water  
14 at a trickle; Station Nos. 2 and 5 had normal pressure. I personally checked the pressure at  
15 Station No. 1 and water was at a trickle. I came to the conclusion that the water company  
16 may have lost power to its high pressure pumps.

17  
18 Q. DID YOU TRY TO CONTACT THE WATER COMPANY AT THAT TIME?

19 A. Yes, I dialed the phone number for the water company that was published in the Jefferson  
20 City phone directory. I received a recorded message with a variety of menu items but  
21 eventually was connected with an operator who told me that she was located in western  
22 Illinois. I told her about the absence of water pressure we were experiencing. She said that  
23 she was not aware of the problem but would "make a note of it." I then asked if she had a  
24 number I could dial to reach a local technician. I told her I needed to know the expected  
25 length of the pressure problem. She said she would have someone get back with me. I gave  
26 her a call back number and then we ended the call. I waited for about fifteen minutes for the  
27 return call and thought it best to then contact Chief Rennick who I advised of the problem.

1 Q. WHILE YOU WAITED FOR THE CALL BACK FROM THE COMPANY  
2 REPRESENTATIVE, WHAT DID YOU DO?

3 A. After I contacted Chief Rennick I drove to the water company plant on West Main and rang  
4 the after hours door bell but no one responded. I then returned to Station No. 1 and called  
5 the operator who was in western Illinois. I explained to her that I was not able to find anyone  
6 at the plant. She said she would look into it and we ended our call.

7  
8 Q. DID ANY ONE CALL YOU BACK AFTER THAT CALL?

9 A. Yes. About twenty minutes after my last call with the operator in western Illinois, someone  
10 from the plant called me and said that a problem with the pumps had been solved.

11  
12 Q. WERE YOU ABLE TO CONFIRM THIS?

13 A. I waited a few minutes after receiving that last call and then checked the water pressure at  
14 Station No. 1. It was quickly improving. I then checked with the officers at Station Nos. 3  
15 and 4. Water pressure was improving at those stations as well.

16  
17 Q. HOW LONG HAD THE WATER PRESSURE BEEN LOW THAT EVENING?

18 A. I would estimate that the system experienced lower than adequate operating water pressure  
19 for at least one (1) hour to one hour and fifteen minutes.

20  
21 Q. MR. KARTMANN TESTIFIED THAT THE COMPANY'S RECORDS INDICATED A  
22 LOSS OF ELECTRICAL POWER TO THE TREATMENT PLANT IN THE EVENING OF  
23 SEPTEMBER 14, 2003. DO YOU KNOW IF ANY FIRE STATIONS EXPERIENCED  
24 LOSS OF WATER PRESSURE THAT EVENING?

25 A. I was not on duty that evening and do not know if there was any loss of pressure. However,  
26 I did not later receive any reports that pressure was below normal that evening.

27  
28 Q. DO YOU HAVE ANY RECOMMENDATIONS FOR THE COMMISSION?

1     A.     I join with Chief Rennick in his concern that the company's loss of operating water pressure  
2           for a period of slightly more than an hour, for whatever reason, whether related to power  
3           supplies or the operations of the pumps themselves, is a very serious matter from the point  
4           of view of the Fire Department. Another concern is that on two consecutive weekends in  
5           September of this year, the Company apparently experienced power interruptions or  
6           mechanical problems with its system. The Commission should make the appropriate  
7           inquiries of the Company to insure that there are reliable power supplies in place for back  
8           up power, and that emergency back up pumps are in place if mechanical failures occur.

9  
10    Q.     DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

11    A.     Yes it does.