

In the Matter of:

THE APPLICATION OF MISSOURI-AMERICAN WATER COMPANY, etc.

WR-2020-0344 VOL. II

October 26, 2020



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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

TRANSCRIPT OF PROCEEDINGS

Discovery Conference

October 26, 2020

Jefferson City, Missouri

Volume 2

WebEx

In the Matter of the)
Application of Missouri-)
American Water Company's)
Request for Authority to) Case No. WR-2020-0344
Implement General Rate Increase))
For Water and Sewer Service)
Provided in Missouri Service)
Areas)

NANCY DIPPELL, Presiding
REGULATORY LAW JUDGE

REPORTED BY:
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P R O C E E D I N G S

1
2 JUDGE DIPPELL: Let's go ahead then and go on
3 the record. This is Case No. WR-2020-0344, In the
4 Matter of the Application of Missouri-American Water
5 Company's Request for Authority to Implement General
6 Rate Increase for Water and Sewer Service Provided in
7 Missouri Service Areas.

8 My name is Nancy Dippell, and I'm the
9 Regulatory Law Judge assigned to this matter. We're
10 here today for a Discovery Conference. I appreciate you
11 all allowing me to reschedule that a day early. Staff
12 has filed a statement of a discovery dispute. I'll
13 begin this morning with entries of appearance.

14 We'll start with the Company.

15 MR. COOPER: Thank you, Your Honor. Dean
16 Cooper from the law firm of Brydon, Swearngen &
17 England, PC, P.O. Box 456, Jefferson City, Missouri
18 65102, appearing for Missouri-American Water Company,
19 and I'll pass it along to Mr. Luft to enter his
20 appearance.

21 JUDGE DIPPELL: Mr. Luft.

22 MR. LUFT: Tim Luft, Missouri-American Water,
23 727 Craig Road, St. Louis, Missouri 63141.

24 JUDGE DIPPELL: Thank you. And Staff.

25 MR. JOHNSON: Thank you, Judge. Mark Johnson

1 appearing on behalf of the Staff of the Missouri Public
2 Service Commission, Governor Office Building, Suite 800,
3 200 Madison Street, PO Box 360, Jefferson City, Missouri
4 65102.

5 JUDGE DIPPELL: And Office of the Public
6 Counsel.

7 MR. HALL: Good morning, Judge. Thank you.
8 Caleb Hall appearing on behalf of the Office of the
9 Public Counsel. Our office is located at 200 Madison
10 Street, Suite 650, P.O. Box 2230, Jefferson City,
11 Missouri 65102.

12 JUDGE DIPPELL: And Mr. Harden.

13 MR. HARDEN: Josh Harden on behalf of Triumph
14 Foods, Collins & Jones, 1010 West Foxwood Drive,
15 Raymore, Missouri.

16 JUDGE DIPPELL: And Mr. Bear.

17 MR. BEAR: Thank you, Judge. Brian Bear on
18 behalf of the City of Riverside, 304 East High Street,
19 Jefferson City, Missouri 65101.

20 JUDGE DIPPELL: And Mr. Turner.

21 MR. TURNER: Morning. Matt Turner on behalf
22 of the Municipal League of Metro St. Louis, Armstrong
23 Teasdale, 3405 West Truman Boulevard, Suite 210,
24 Jefferson City, Missouri 65109.

25 JUDGE DIPPELL: Did I miss any other attorneys

1 that need to make an entry?

2 All right. Well, like I said, we are here
3 this morning for a Discovery Conference and Staff had
4 filed a statement of concern. So Mr. Johnson, I will
5 let you begin with giving us a little summary of what's
6 going on here.

7 MR. JOHNSON: Certainly. Thank you. I will
8 try not to take up too much of our time this morning
9 since it's in regard to a single DR. This dispute is in
10 regard to DR 219 filed by Staff which concerns a request
11 for information of rate case expense for certain
12 Missouri-American affiliates, which would be other
13 subsidiary regulated companies in other jurisdiction.

14 Specifically subsections 2 and 3 of the DR
15 were objected to and no response provided. Those
16 requests dealt with asking the Company to provide total
17 amounts of budgeted rate case expense, total amounts of
18 rate case expense actually incurred and amounts ordered
19 by the Commissions and included in rates or other
20 jurisdictions with subsidiaries of American-Water
21 Company, and then subsection 3 was a list of consultants
22 or vendors utilized for the subsidiary's rate case with
23 the name of each consultant or vendor, amount budgeted,
24 amounts actually expended and a description of the
25 services provided.

1 We also requested if there were hourly charges
2 to provide the amounts charged per hour and the number
3 of hours each consultant spent performing the service
4 along with the description of services.

5 Missouri-American did submit an objection
6 letter to Staff indicating that they believed the
7 request for this information was not relevant to this
8 proceeding, not proportional to the needs of this case
9 considering the totality of the circumstances, nor
10 reasonably calculated to lead to the discovery of
11 admissible evidence in that the requests were concerning
12 American Water Company subsidiaries. Additionally, the
13 Company states the information is beyond
14 Missouri-American's possession, custody, or control.

15 First of all, Staff believes the information
16 requested is wholly relevant to this matter in that
17 Staff is tasked with determining the prudence of
18 Missouri-American's rate case expense in this case. And
19 in doing that comparison to other companies in other
20 similar issues can be very helpful.

21 Now, Staff understands that these are
22 different subsidiaries. However, they are subsidiaries
23 of the same parent structure. To the extent the
24 information is available, the litigation of similar
25 issues and other jurisdictions can at the very least

1 provide Staff with a starting point for the comparison
2 of costs and for the request of further discovery.

3 Further, Missouri-American does utilize
4 similar or the same vendors in some of their
5 jurisdictions. That information we feel would be
6 directly relevant to this matter. Now, as far as the
7 information being beyond the custody, possession or
8 control of the company, Staff finds that to be somewhat
9 unlikely. Throughout this case and many prior cases,
10 Missouri-American has been able to provide Staff with
11 information relating to its parent company and its
12 affiliates.

13 In this case alone, Staff has been provided
14 with a listing of completed and pending rate cases.
15 Jurisdictions for other American Water Works Company
16 subsidiaries Missouri-American has provided Staff with
17 listings of rate cases for subs where consultants
18 utilized in this pending rate case were also utilized.
19 In addition, we've gotten dates, case numbers, specific
20 issues that were presented by those consultants and
21 whether the jurisdiction ultimately adopted that
22 position.

23 Now, Missouri-American routinely provides
24 information to Staff based off of -- in regard to rate
25 of return and capital structure information. It's also

1 provided information regarding use of future test years
2 in other jurisdictions and has identified the use of
3 various rate mechanisms and the various rate designs
4 utilized by its subsidiaries.

5 In Staff's opinion, we believe the Company
6 should have information regarding rate case expense
7 within its control or at the very least within its
8 ability to obtain. The request that Staff has made has
9 been limited to rate cases that have occurred within the
10 past three years, and by our review based upon responses
11 provided by the Company this would be limited to I
12 believe probably four or maybe five affiliate companies.
13 I believe those jurisdictions would be Kentucky, New
14 Jersey, Pennsylvania and West Virginia.

15 Staff is perfectly willing to work with the
16 Company if there would be a way to limit our request or
17 alter it in a certain way that could provide the Company
18 the ability to get us a response timely. But of course,
19 we certainly would be wishful for the Commission to
20 direct the Company to respond to our DR as written.

21 JUDGE DIPPELL: Okay. Does the Company have a
22 response?

23 MR. COOPER: Yes, Your Honor. I guess I'd
24 start with this. Not that it's necessarily contrary to
25 anything that Mr. Johnson said. Certainly the

1 information being requested here is not part of the
2 books and records of Missouri-American Water Company.
3 The information requested is not held by subsidiaries of
4 Missouri-American Water Company or companies in which
5 Missouri-American has an ownership interest or an equity
6 interest. These are companies that while they share
7 American Water as a parent they're located in different
8 states. Proceedings are before different Commissions.
9 They include different processes, different intervenors,
10 different history of issues amongst the states, that
11 sort of thing.

12 So going back to the original objection, I
13 think, one, it's not within the possession, custody or
14 control of Missouri-American. It's not
15 Missouri-American's information to start with. And
16 second, even if you got past that and only if you got
17 past that would relevance become an issue. Again, we
18 don't see how any of that information from other states
19 is going to be relevant to reasonableness of rate case
20 expense within Missouri before the Missouri Public
21 Service Commission for Missouri-American Water Company.

22 Mr. Johnson mentioned that there is
23 information from affiliates provided from time to time
24 in response to DRs. Certainly the Company works hard to
25 try to do that when it can. In particular, it's very

1 sensitive to the fact that where there are allocations
2 from entities and dollars that would relate to this rate
3 case that it works very hard to provide that
4 information. For example, the American Water Service
5 Company which flows costs. The Company certainly does
6 work very hard to get that sort of affiliate information
7 to the Staff and other parties and will continue to do
8 so. I don't think that that should be held against it
9 in this sort of dispute where we're talking about
10 information that does not flow through
11 Missouri-American's rates and it's not its information
12 by any stretch of the imagination.

13 The Company, I think Mr. Johnson suggested,
14 has provided a response to subsection 1 in terms of a
15 listing of both recently completed cases and pending
16 cases for the various American Water subsidiaries.
17 Certainly in terms of public information the Staff could
18 go and acquire information from those dockets just like
19 any other member of the public.

20 The Company has also provided responses to sub
21 part 4 and sub part 5. So ultimately Missouri-American
22 I guess is standing on its objection at this point and
23 we'll turn it back over to you, Judge.

24 JUDGE DIPPELL: Are there comments from any of
25 the other parties? Mr. Hall.

1 MR. HALL: Judge, if I may just briefly in
2 support of Staff's concerns on this discovery request is
3 a common refrain from all public utilities that the rate
4 of return and return on equity across the U.S. is
5 relevant for the Commission to consider when authorizing
6 a return. If returns across the U.S. -- across
7 affiliates are relevant, then the rate case expense
8 amongst affiliates is wholly relevant in this
9 proceeding.

10 The promise and peril of utilities that do
11 business in other states is that businesses in other
12 states are relevant for this Commission to consider.
13 Thank you.

14 JUDGE DIPPELL: Thank you. Any other comments
15 from --

16 MR. COOPER: Yes, Judge. To Mr. Hall's point,
17 I think that while rate of return is an issue that's
18 relevant from state to state to state, because entities
19 are competing for financing, rate case expense is not
20 like that. It's just -- it's in a different category.
21 The entities, the public utilities are not competing for
22 rate case expense like they would for capital financing
23 in the markets.

24 JUDGE DIPPELL: But rate case expense I assume
25 is an expense the Company is asking to be reimbursed

1 through rates, correct?

2 MR. COOPER: Certainly, certainly. It's
3 expense in this case it's requesting to recover.

4 JUDGE DIPPELL: Any other comments from the
5 other parties? I'm not seeing anything. Well, I mean,
6 I definitely see the relevance of receiving that
7 information and how it might lead to discoverable
8 admissible information for Staff. With regard to
9 whether or not it's within the Company's possession and
10 control, that's a little tougher. Mr. Johnson, are you
11 aware has this type of information been provided from
12 the Company before or from other companies in a similar
13 situation?

14 MR. JOHNSON: As far as specifically to rate
15 case expense, Your Honor, I'm not aware of another
16 situation directly on point. So no, no, I'm not. I
17 would add though that from Staff's perspective when it
18 is -- this probably goes a little more towards the
19 relevance. When we're determining prudence of expense
20 items, we're not just determining prudence of the
21 expense itself but the level of expense. So comparisons
22 are very helpful and we are completely understandable
23 that different jurisdictions do have different
24 procedures. The issues may not be 100 percent
25 comparable. However, it does provide Staff with a

1 starting point, especially in regard to hourly fees,
2 contract prices where we are able to perform additional
3 discovery.

4 MR. BEAR: Judge, if I may, Brian Bear on
5 behalf of the City of Riverside.

6 JUDGE DIPPELL: Go ahead.

7 MR. BEAR: I have litigated in the circuit
8 courts a similar case that was the situation that we're
9 dealing with now. It is not reported in the Southwest
10 Reporter, but it was taken up on a writ which is
11 SC91146, State ex rel. Ford Motor Credit vs. Jack Grate.
12 In that case, Your Honor, ten years ago we were trying
13 to obtain documents from Ford Motor Company through
14 discovery requests that were sent on Ford Motor Credit.
15 And so as we were talking about that, the principal
16 issue there that we were writted up on was whether Ford
17 Motor Credit as a wholly-owned subsidiary of Ford Motor
18 Company had an obligation to produce documents that were
19 in the possession of Ford Motor Company. And the lower
20 court ruled that they did have the practical ability to
21 obtain based on a host of facts that were presented to
22 the trial court. They writted that all the way up to
23 the Supreme Court, and the Supreme Court declined to
24 issue a writ to sustain that. So it has been up before.
25 My recollection from that case is there's not a lot of

1 reported Missouri case law on it. But within the civil
2 discovery, the inquiry, as I'm trying to recall this
3 case, was is it within the practical ability to control.
4 And I think what Mr. Johnson and Mr. Hall are saying is
5 that at least in some aspects there is information where
6 there is a practical ability to obtain some information
7 from these other entities. So I would just point that
8 out to the extent it may help. It is -- Under the civil
9 rules, it was a fact specific inquiry that I wanted to
10 make you aware of that, Judge.

11 JUDGE DIPPELL: Thank you.

12 MR. COOPER: Judge.

13 JUDGE DIPPELL: Mr. Cooper.

14 MR. COOPER: I'm not familiar with the
15 specific case that Mr. Bear is recollecting here. I
16 guess I'd hesitate for you to, although I certainly
17 respect Mr. Bear and his memory, I'd encourage you to
18 not merely go off of sort of an anecdotal recitation of
19 a discovery dispute. I would also point out that in
20 regard to Mr. Bear's description of that case he's
21 talking about a subsidiary and information sought from a
22 parent, and that's not our situation in this case.
23 These are affiliates, but they do not fall in the same
24 ownership line as Missouri-American.

25 JUDGE DIPPELL: I understand that. I

1 appreciate that comment. That brings me I guess to my
2 decision today is not to make a decision today, but I am
3 going to authorize Staff to go ahead and make a motion
4 for production and let you respond in writing and you
5 all can cite any relevant case law or non-reported case
6 law if that be the case. But I think that's how we'll
7 go forward. If you all work it out in the meantime, all
8 the better. But if you can do that -- well, it's in
9 your interest, Mr. Johnson, to do that as quickly as
10 possible. I will give Mr. Cooper a chance, the Company
11 a chance to respond to your motion, of course, before
12 making a ruling.

13 MR. LUFT: Judge, I would just add just for
14 your information, so far I think we're in month four or
15 whatever in this rate case, we've received 623 discovery
16 requests from the parties, which is quite a bit more
17 that we received in the last rate case. Just for your
18 information, we're responding to 99 percent of that just
19 to let you know in terms of the amount of material that
20 we're putting forth and producing in this case.

21 JUDGE DIPPELL: I appreciate that this is the
22 first and it seems to be a very narrow dispute that has
23 come up. So I appreciate continued cooperation. But a
24 dispute is a dispute. So we'll hear it out.

25 Is there anything else from any of the

1 parties? All right. Well, I appreciate you all coming
2 this morning. I guess I didn't state at the beginning
3 that we were via WebEx video and telephone conference.
4 That was probably obvious from the transcript. But just
5 in case it's not, due to the pandemic situation we're
6 working these things remotely. So I appreciate you all
7 bearing with the technology, and we can go ahead and go
8 off the record. Thank you.

9 (Off the record.)

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