

**Exhibit No.**  
**Issues: Whether Carl Mills' Trust should be granted a certificate of convenience to operate the water system.**  
**Witness: Derald Morgan**  
**Sponsoring Party: Intervenors**  
**Type of Exhibit: Surrebuttal Testimony**  
**Case No.: WA-2018-0370**  
**Date Prepared: March 8, 2019**

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

|  |   |                       |
|--|---|-----------------------|
|  | ) |                       |
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|  | ) |                       |
| In the Matter of Carl R. Mills Trust for a | ) |                       |
| Certificate of Convenience and Necessity   | ) | File No. WA-2018-0370 |
| Authorizing it to Install, Own, Acquire,   | ) |                       |
| Construct, Operate, Control, Manage and    | ) |                       |
| Maintain Water Systems in Carriage Oaks    | ) |                       |
| Estates                                    | ) |                       |
|  | ) |                       |
|  | ) |                       |
|  | ) |                       |

**SURREBUTTAL OF AMANDA MCMELLEN'S TESTIMONY BY DERALD MORGAN**  
**ON BEHALF OF INTERVENORS**

**Branson, Missouri**  
**March 8, 2019**

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1 the water. All samples for bacteria and quality should be taken from the point farthest  
2 from the treatment area.

3 Thirdly, he has not tested for free chlorine and this test should be done at least  
4 every week. It is a simple titration test that can be done in a couple of minutes and has  
5 little cost and no cost if the well and system are inspected weekly.

6 Fourthly, the tank does not have a free chlorine monitor on the tank and this needs  
7 to be installed to assure that the water treated is properly treated and that the levels of  
8 free chlorine are maintained.

9 Finally, McMellen has included a reasonable estimate for bush-hogging expense  
10 by estimating the annualized total at 30 weeks per year, approximately 15 minutes each  
11 time, at \$50 an hour, including labor and a tractor. This is not an appropriate analysis  
12 since there has never been any bush hogging or clearing of areas around the well and  
13 tank. It is impossible to bush hog the slope around the well and tank. This is a false claim  
14 by Mills and a failure of staff to observe the well and placement of the tank and well. No  
15 expense for clearing or maintaining the area should be included.

16 **Q. Did Ms. McMellen analyze the amounts incorporated in the cost of each lot**  
17 **that is attributed to the cost of the construction of the well and the system?**

18 As far as I can tell, this analysis was not made. Each person purchasing a lot paid  
19 a part of the construction costs of the well and system. Each lot owners should be  
20 credited for the costs allocated to the lot based on Mills intent to recoup all his costs for  
21 the development. She also as best I can tell incorporated the cost of the tank and pumps  
22 installed a few years ago in her analysis. In Mills' previous filings he indicated that this  
23 equipment was paid for by a Charity that he owned. Unless Mills can show clearly that he  
24 repaid the Charity for these costs by having a staff investigation and proof of repayment,  
25 then these equipment costs should not be included in the system costs.

