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May 7, 2002

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Missouri-American Water Company - Case No. WO-2002-273**

Dear Mr. Roberts:


Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Surrebuttal Testimony of Captain Robert Young, Edward J. Grubb and Frank L. Kartmann. Please note that the testimony of Messrs. Grubb and Kartmann contains information which has been deemed to be "Highly Confidential" under the terms of the Protective Order in place in this proceeding. Consequently, also please find enclosed one copy of the Non-Proprietary version of each testimony, along with an envelope containing copies of the "HC Pages Only" of each testimony.

If you have any questions concerning this matter, then please do not hesitate to contact me.  
Thank you for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

  
Dean L. Cooper *ly Ps*

DLC/rhg  
Enclosures

cc: Mr. Keith Krueger, PSC  
Ms. Ruth O'Neill, OPC  
Mr. Stuart Conrad  
Mr. Jeremiah Finnegan  
Mr. James Deutsch  
Ms. Jan Bond

Exhibit No.:  
Issues: Perspective on Security  
Witness: CPT Robert Young  
Exhibit Type: Surrebuttal  
Sponsoring Party: Missouri-American Water  
Company  
Case No.: WO-2002-273  
Date: May 7, 2002

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. WO-2002-273**

**FILED<sup>3</sup>**

**MAY 07 2002**

**SURREBUTTAL TESTIMONY**

**Missouri Public  
Service Commission**

**OF**

**CAPTAIN ROBERT YOUNG**

**ON BEHALF OF**

**MISSOURI-AMERICAN WATER COMPANY**

**JEFFERSON CITY, MISSOURI**

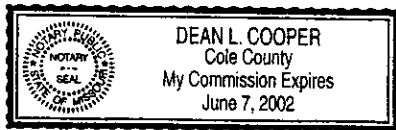
State of Missouri     )  
                                  ) ss  
County of Cole         )

AFFIDAVIT OF CAPTAIN ROBERT YOUNG

Captain Robert Young, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Surrebuttal Testimony of Captain Robert Young"; that said testimony was prepared by him and/or under his direction and supervision; that if inquiries were made as to the facts in said testimony, he would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of his knowledge, information, and belief.

Capt R C Young

Subscribed and sworn to before me this 6 day of May, 2002.



W. L. Cooper  
Notary Public

My Commission expires:

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**SURREBUTTAL TESTIMONY**  
**CAPTAIN ROBERT YOUNG**

**WITNESS INTRODUCTION**

1   **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2   A. My name is Captain Robert Young and my business address is 14847 Olive  
3   Boulevard, Chesterfield, Missouri 63017.

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

5   A. I am employed by the St. Louis County Police Department and assigned as the  
6   Commander of our Office of Emergency Management.

7   **Q. PLEASE ELABORATE UPON YOUR DUTIES AS COMMANDER OF THE**  
8   **OFFICE OF EMERGENCY MANAGEMENT.**

9   A. As the Commander, I, along with my staff of specialists, have a variety of  
10   responsibilities. They involve the developing of various emergency plans, to  
11   include the County's Basic Emergency Operations Plan, our Code 1000 Plan  
12   and our Multi-Agency Terrorism Response Plan; coordinating and assisting with  
13   specific emergency responses; hosting and delivering a variety of emergency  
14   management relating training programs; serving as liaison to multiple  
15   jurisdictions and government entities; and maintaining St. Louis County's 212  
16   Outdoor Severe Weather Warning Sirens.

17           I also serve as the Chairman of the St. Louis County Local Emergency  
18   Planning Committee ("LEPC") and, along with 30 LEPC members, appointed by  
19   the St. Louis County Executive, and approved by the St. Louis County Council,  
20   work hand in hand with the Hazardous Materials Emergency Response Team of  
21   St. Louis County, the chemical industry and various emergency responders,

1 concerning hazmat planning, education and emergency response within St.  
2 Louis County.

3 **Q. WOULD YOU PLEASE DESCRIBE YOUR EXPERIENCE IN THE LAW**  
4 **ENFORCEMENT AREA?**

5 A. I have served more than 35 years in the field of law enforcement. I have been  
6 the Commander of the St. Louis County Police Department's Office of  
7 Emergency Management for the past five years.

8 I began my career in law enforcement with the St. Louis City Police  
9 Department in 1966. In 1969, I went to work for the St. Louis County Police  
10 Department. While with the St. Louis County Police Department, I have served  
11 in a variety of positions including patrol officer, crime scene detective, fingerprint  
12 examiner, field supervisor, watch commander, head of the Criminal Identification  
13 Bureau, commander of the Special Operations Bureau, and now, Commander of  
14 Emergency Management.

15 **Q. WOULD YOU PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND?**

16 A. I graduated from the St. Louis City Police Department Academy and the St.  
17 Louis County Police Department Academy in the 1960's, attended Columbia  
18 College courses in St. Louis and graduated in 1975 with a Bachelor of Arts  
19 Degree. My course work was all law enforcement related. I have also  
20 participated in many training courses and seminars over the years sponsored by  
21 our local police academy, the MO State Emergency Management Agency and  
22 others. Legal subjects have been on topics ranging from criminal law and  
23 investigations, to supervision, to liability issues. Other topics have covered  
24 disaster planning and preparedness along with hazardous materials planning

1 and response. I also graduated from the FBI National Academy in 1994, which  
2 is a police administration course of eleven weeks.

3 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN ADMINISTRATIVE OR OTHER**  
4 **LEGAL PROCEEDINGS?**

5 A. Yes. I have testified during jury trials against persons arrested for various  
6 crimes, and some years ago, as a latent fingerprint examiner identifying  
7 fingerprints from crime scenes. I've given various depositions over the years  
8 pertaining to criminal and civil litigation.

9 **PURPOSE**

10 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

11 A. I have been asked to attempt to put in perspective, the overall impact the events  
12 of September 11, 2001, have had on the security focus of utilities and others in  
13 response to the Rebuttal Testimony filed by Missouri Public Service Commission  
14 ("Commission") Staff ("Staff") witness Janis E. Fischer and Office of the Public  
15 Counsel ("Public Counsel") witness Kimberly K. Bolin.

16 **PERSPECTIVE ON SEPTEMBER 11, 2001 IMPACTS**

17 **Q. PUBLIC COUNSEL WITNESS BOLIN INDICATES IN HER REBUTTAL**  
18 **TESTIMONY THAT MAWC SHOULD HAVE HAD THE SUBJECT SECURITY**  
19 **MEASURES IN PLACE PRIOR TO SEPTEMBER 11, 2001 (BOLIN REB., P. 3,**  
20 **10, 20). DO YOU VIEW THE EVENTS OF SEPTEMBER 11, 2001, AS HAVING**  
21 **IMPACTED THE GENERAL APPROACH TO SECURITY MEASURES IN THIS**  
22 **STATE?**

23 A. Yes.

24 **Q. HOW?**

1 A. The events of September 11, 2001 brought our vulnerabilities and the realism of  
2 domestic terrorism closer to home. After September 11, 2001, our federal law  
3 enforcement agencies stepped up all levels of investigations pertaining to threats  
4 made against our country and our way of living. They also improved their level  
5 of communications with local law enforcement personnel regarding intelligence  
6 data developed.

7 **Q. DO YOU HAVE AN EXAMPLE OF THIS GREATER FEDERAL**  
8 **INVOLVEMENT?**

9 A. Yes. The fact that we now receive alerts in an effort to assist in our focus and  
10 preparedness for terrorist acts. One alert we received from the FBI was dated  
11 October 7, 2002, indicating that the nation's drinking water was perhaps in  
12 jeopardy, another concerning possible anthrax contamination, and the more  
13 recent alert just last month, indicating that financial institutions in the  
14 northeastern part of the United States were possibly being considered as  
15 potential targets.

16 **Q. DID YOU RECEIVE SUCH ALERTS PRIOR TO SEPTEMBER 11, 2001?**

17 A. No. I do not recall having received these types of warnings until after the events  
18 of September 11, 2001.

19 **Q. DID YOUR OFFICE PLACE ANY ADDITIONAL EMPHASIS ON UTILITY**  
20 **SECURITY IN LIGHT OF THE EVENTS OF SEPTEMBER 11, 2001?**

21 A. Yes.

22 **Q. HOW DID THIS EMPHASIS MANIFEST ITSELF?**

23 A. After receiving the security alert identifying water utilities as a possible terrorism  
24 target, my office contacted all the utilities in our area, which include  
25 Southwestern Bell Telephone, Laclede Gas, AmerenUE, the Metropolitan St.



1 Louis Sewer District and MAWC. Representatives of these utilities attending a  
2 meeting at our Emergency Operations Center on October 15, 2001, to discuss  
3 security issues.

4 **Q. WHAT WAS CONVEYED TO THE UTILITIES WITHIN YOUR AREA OF**  
5 **RESPONSIBILITY?**

6 A. They were asked to reexamine their security efforts in light of the alerts and  
7 recent events and asked to take any and all additional steps possible in order to  
8 minimize the risk of a terrorism attack in our community.

9 **Q. WERE YOU ALSO ASKED BY ANY FEDERAL OR STATE OFFICIALS TO**  
10 **INCREASE YOUR EFFORTS AFTER SEPTEMBER 11, 2001?**

11 A. Yes. In a meeting with the Governor's Special Advisor for Homeland Security  
12 Colonel Tim Daniel, we in the St. Louis region, were asked to form a regional  
13 security panel with committees that would mirror the Missouri Security Panel.  
14 The seven committees of the panel were to identify critical facilities, determine  
15 levels of readiness and identify recommendations to enhance our preparedness  
16 against threats of terrorism. This effort involved over one hundred community  
17 professionals and culminated with a formal report to Governor Holden, which  
18 was delivered here in St. Louis on January 25, 2002.

19 **Q. PUBLIC COUNSEL WITNESS BOLIN ALSO INDICATES IN HER REBUTTAL**  
20 **TESTIMONY THAT MAWC'S PAST EXPERIENCE WITH VANDALISM AND**  
21 **TRASH DUMPING SHOULD HAVE BROUGHT ABOUT THE CHANGES IN**  
22 **MAWC'S SECURITY WHICH HAVE BEEN IMPLEMENTED SINCE**  
23 **SEPTEMBER 11, 2001 (BOLIN REB., P. 10). ARE THERE DIFFERENCES IN**  
24 **THE LEVEL OF CONCERN RESULTING FROM ISOLATED VANDALISM**  
25 **INCIDENTS AND THE EVENTS OF SEPTEMBER 11, 2001?**

1 A. I would surely hope that everyone thinks there is. Vandalism to MAWC property  
2 I feel, generally involves a prank or a "dare", that is one young person being  
3 challenged by another, or a group, using peer pressure, and being intimidated  
4 into using, lets say, spray paint on a water tower, or building. We have all seen  
5 the graffiti. Trash dumping usually involves laziness by someone or a person  
6 trying to save a dollar or two by not having to pay for proper trash disposal. Just  
7 throw it or dump it on some else's property. I do not feel you can even begin to  
8 compare this type of activity to possible threats of contamination to your  
9 community's drinking water supply.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. Yes, it does.