

City of Riverside, Missouri
List of Exhibits
WR-2011-0337

Riverside-1

Direct Testimony of David Blackburn

Riverside-2

Direct Testimony of Mayor Kathy Rose

Riverside Exhibit No. 1
Date 2-21-12 Reporter JL
File No. WR-2011-0337

EXHIBIT NO. **RIVERSIDE-1**
ISSUE: REVENUE REQUIREMENT
WITNESS: DAVID BLACKBURN
TYPE OF EXHIBIT: DIRECT
TESTIMONY
SPONSORING PARTY: CITY OF
RIVERSIDE
CASE NUMBER: WR-2011-0337
DATE PREPARED: NOVEMBER 17,
2011

MISSOURI-AMERICAN WATER COMPANY

WR-2011-0337

DIRECT TESTIMONY OF

DAVID BLACKBURN

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

ON BEHALF OF

CITY OF RIVERSIDE

NOVEMBER 17, 2011

1 Missouri-American Water Company

2 WR-2011-0337

3 Direct Testimony of David Blackburn

4 Q. PLEASE STATE YOUR NAME.

5 A. My name is David Blackburn.

6 Q. ON WHOSE BEHALF ARE YOU APPEARING FOR THE PURPOSES OF THIS
7 DIRECT TESTIMONY?

8 A. I am appearing for the purposes of this testimony on behalf of intervenor City of
9 Riverside (the "City"). The City receives service directly and its residents also receive
10 service from Missouri-American Water Company ("MAWC").

11 Q. PLEASE DESCRIBE YOUR EMPLOYMENT.

12 A. I am the City Administrator for the City.

13 Q. WHAT IS YOUR INTEREST IN THIS PARTICULAR CASE?

14 A. I am testifying as a representative of the City, which is attempting to protect its citizens in
15 the present case. The City is within the Parkville District, subject to the Platte County
16 water tariff at issue in this case.

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

18 A. The purpose of my testimony is to describe certain water service and public safety issues
19 affecting the City. The City also requests that these issues be considered in determining
20 its water rate.

1 Q. WHAT ARE THE CITY'S MAJOR PUBLIC SAFETY CONCERNS WITH THE
2 WATER SERVICE PROVIDED BY MAWC?

3 A. The City's major public safety concerns with the water distribution system are low water
4 pressure and low gallons per minute produced by the fire hydrants located within the
5 City. As described in the testimony submitted by Fire Chief Fowlston in WR-2010-0131,
6 the City's Fire Department has had difficulty with the low water pressure produced by the
7 City's fire hydrants when responding to fires within the City. The City is very concerned
8 about this public safety issue, and has requested and reviewed information provided by
9 MAWC related to fire flows within the City.

10 Q. BASED ON THE INFORMATION PROVIDED BY MAWC, ARE THE FIRE
11 FLOWS PRODUCED BY THE CITY'S WATER DISTRIBUTION SYSTEM
12 WITHIN THE CITY SUFFICIENT FOR FIRE PROTECTION?

13 A. No, based on the information provided by MAWC, it appears that approximately thirty-
14 five percent (35%) of the fire hydrants located in residential areas of the City do not meet
15 the City's minimum residential fire flow requirements. It also appears that nearly all of
16 the fire hydrants located in commercial areas of the City do not meet the City's minimum
17 commercial fire flow requirements, unless such fire hydrants are all operating at their
18 maximum capacity.

19 Q. WHAT ARE THE CITY'S MINIMUM FIRE FLOW REQUIREMENTS?

20 A. Under the City's Ordinance 2005-05, the City has minimum residential fire flow
21 requirements of 1,000 gallons per minute, and minimum commercial fire flow

1 requirements of 1,500 gallons per minute. These fire flow requirements are based on the
2 requirements contained in the 2003 International Fire Code.

3 **Q. HOW LONG HAVE THESE FIRE FLOW REQUIREMENTS BEEN**
4 **EFFECTIVE?**

5 A. The current fire flow requirements became effective on January 18, 2005, when
6 Ordinance 2005-05 was adopted. Prior to January 18, 2005, the City had adopted the
7 1994 Uniform Fire Code, which contains similar requirements regarding fire flows (1,000
8 gallons per minute for residential areas and 1,500 gallons per minute for commercial
9 areas).

10 **Q. DO OTHER DISTRICTS WITHIN MAWC'S SERVICE AREA HAVE SIMILAR**
11 **FIRE FLOW REQUIREMENTS?**

12 A. Yes, to our knowledge many other districts within MAWC's service area have similar or
13 greater minimum fire flow requirements. The City believes that its fire flow
14 requirements are standard and reasonable.

15 **Q. BASED ON THE FOREGOING, WHAT RELIEF ARE YOU REQUESTING IN**
16 **RELATION TO THESE ISSUES?**

17 A. The City believes that MAWC has an obligation to furnish and provide water service,
18 instrumentalities and facilities, including fire flows, as shall be safe and adequate and in
19 all respects just and reasonable. Accordingly, the City believes that MAWC is obligated
20 to keep its infrastructure reasonably updated to comply with the City's reasonable fire
21 flow requirements, which have been effective since the City's adoption of the 1994
22 Uniform Fire Code standards, and that the costs of any necessary or advisable upgrades

1 should be shared by MAWC's equity owners. Therefore, the City requests that MAWC
2 be required to take reasonable action in good faith to update its water distribution system
3 in order to comply with the City's reasonable fire flow requirements, and to ensure that
4 the equity owners of MAWC share in the cost of such improvements in a reasonable
5 manner.

6 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

7 **A. Yes.**

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

1
2
3
4
5
6
7
8
9

In the matter of Missouri-American)
Water Company's Request for Authority)
to Implement a General Rate Increase) Case No. WR-2011-0337
for Water and Sewer Service Provided)
in Missouri Service Areas)

Affidavit of David Blackburn

11 State of Missouri)
12) ss.
13 County of Platte)

David Blackburn, being first duly sworn, on his oath states:

15 1. My name is David Blackburn. I am City Administrator for the City of Riverside,
16 Missouri.

17 2. The above Direct Testimony in question and answer form was prepared by me, or at
18 my direction.

19 3. I hereby swear and affirm that the aforesaid written direct testimony is true and
20 accurate to the best of my present knowledge, information and belief.

21 David Blackburn
22 David Blackburn

23 Subscribed and sworn to before me on this 17th day of November, 2011.

24 Robin L. Littrell
25 Notary Public

26 My commission expires: March 8, 2015

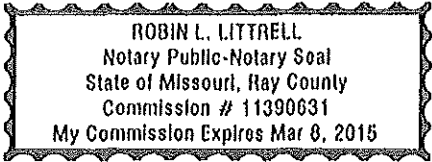


EXHIBIT NO. **RIVERSIDE-2**
ISSUE: REVENUE REQUIREMENT
WITNESS: MAYOR KATHY ROSE
TYPE OF EXHIBIT: DIRECT
TESTIMONY
SPONSORING PARTY: CITY OF
RIVERSIDE
CASE NUMBER: WR-2011-0337
DATE PREPARED: NOVEMBER 17,
2011

MISSOURI-AMERICAN WATER COMPANY

WR-2011-0337

DIRECT TESTIMONY OF

MAYOR KATHY ROSE

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION

ON BEHALF OF

CITY OF RIVERSIDE

NOVEMBER 17, 2011

1 Missouri-American Water Company

2 WR-2011-0337

3 Direct Testimony of Mayor Kathy Rose

4 **Q. PLEASE STATE YOUR NAME.**

5 A. My name is Kathy Rose.

6 **Q. ON WHOSE BEHALF ARE YOU APPEARING FOR THE PURPOSES OF THIS**
7 **DIRECT TESTIMONY?**

8 A. I am appearing for the purposes of this testimony on behalf of intervenor City of
9 Riverside (the "City"). The City receives service directly and its residents also receive
10 service from Missouri-American Water Company ("MAWC").

11 **Q. PLEASE DESCRIBE YOUR EMPLOYMENT.**

12 A. I am the Mayor of the City.

13 **Q. WHAT IS YOUR INTEREST IN THIS PARTICULAR CASE?**

14 A. I am testifying as a representative of the City, which is attempting to protect its citizens in
15 the present case. The City is within the Parkville District, subject to the Platte County
16 water tariff at issue in this case.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of my testimony is to address whether the City supports a consolidated tariff
19 rate structure and to address certain water service and public safety issues affecting the
20 City.

1 Q. DOES THE CITY SUPPORT A CONSOLIDATED TARIFF RATE STRUCTURE
2 AS REQUESTED BY MAWC IN THIS CASE?

3 A. Yes, provided that the water rates applicable to customers located within the City are
4 reduced by at least the amount described in MAWC's materials filed in this case.
5 However, the City also believes that the inadequate fire flows produced by MAWC's
6 water distribution system, as described in the testimony submitted by David Blackburn in
7 this case, should be a factor in determining the final tariff rates.

8 Q. DOES THE CITY BELIEVE THAT MAWC SHOULD TAKE FURTHER
9 ACTION TO ADDRESS THE CITY'S PUBLIC SAFETY CONCERNS
10 REGARDING FIRE FLOWS?

11 A. Yes, the City is very concerned about the public safety issues created by the inadequate
12 fire flows produced by MAWC's water distribution system, and is not satisfied with
13 MAWC's previous responses to this issue. The City believes that MAWC should take
14 every reasonable action to correct the fire flow deficiencies within the water distribution
15 system. At a minimum, MAWC must take action in good faith in order to address these
16 issues. For example, if MAWC could commit to improve the fire flows within the City to
17 comply with the City's current fire flow requirements based on the 2003 International
18 Fire Code by the year 2020, and to add at least one fire hydrant (or a number as agreed
19 between MAWC and the City's Fire Chief) to the water distribution system within the
20 City per year, it would be a step in the right direction.

1 Q. **BASED ON THE FOREGOING, WHAT RELIEF ARE YOU REQUESTING IN**
2 **RELATION TO THESE ISSUES?**

3 A. The City believes that a consolidated rate structure should be adopted only if the water
4 rates applicable to customers located within the City are reduced by at least the amount
5 described in MAWC's materials filed in this case, and that the inadequate fire flows
6 produced by MAWC's water distribution system should be a factor in determining the
7 final tariff rates. The City also believes that MAWC is obligated to keep its infrastructure
8 reasonably updated to comply with the City's reasonable fire flow requirements, and that
9 the costs of any necessary or advisable upgrades should be shared by MAWC's equity
10 owners. Therefore, the City requests that a consolidated tariff rate structure and final
11 tariff rates consistent with the foregoing be adopted in this case. The City also requests
12 that MAWC be required to take reasonable action in good faith to update its water
13 distribution system in order to comply with the City's reasonable fire flow requirements
14 consistent with the foregoing, and to ensure that the equity owners of MAWC share in the
15 cost of such improvements in a reasonable manner.

16 Q. **DOES THAT CONCLUDE YOUR TESTIMONY?**

17 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

1
2
3
4
5
6
7
8
9

In the matter of Missouri-American)
Water Company's Request for Authority)
to Implement a General Rate Increase)
for Water and Sewer Service Provided)
in Missouri Service Areas)

Case No. WR-2011-0337

Affidavit of Mayor Kathy Rose

10
11
12
13

State of Missouri)
County of Platte) ss.

14
15
16
17
18
19

Kathy Rose, being first duly sworn, on her oath states:

1. My name is Kathy Rose. I am Mayor of the City of Riverside, Missouri.

2. The above Direct Testimony in question and answer form was prepared by me, or at my direction.

3. I hereby swear and affirm that the aforesaid written direct testimony is true and accurate to the best of my present knowledge, information and belief.

Kathy Rose
Kathy Rose

Subscribed and sworn to before me on this 17th day of November, 2011.

Sheila Payne
Notary Public

My commission expires:

