

Exhibit No.:
Issues: Eureka Acquisition
Witness: Kelly A. Simpson
Exhibit Type: Surrebuttal
Sponsoring Party: Missouri-American Water Company
Case No.: WA-2021-0376
Date: December 17, 2021

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WA-2021-0376

SURREBUTTAL TESTIMONY

OF

KELLY A. SIMPSON

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

AFFIDAVIT

I, Kelly A. Simpson, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am Owner for Flinn Engineering, LLC, that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.


Kelly A. Simpson

December 17, 2021
Dated

**SURREBUTTAL TESTIMONY
KELLY A. SIMPSON
MISSOURI AMERICAN WATER COMPANY
CASE NO.: WA-2021-0376**

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SURREBUTTAL TESTIMONY

KELLY A. SIMPSON

I. INTRODUCTION

1

2 **Q. Please state your name and business address.**

3 A. Kelly A. Simpson. My business address is 11216 Neumann Lane, Highland, Illinois 62249.

4 **Q. Are you the same Kelly A. Simpson who previously submitted direct testimony in this**
5 **proceeding?**

6 A. Yes.

7 **Q. What is the purpose of your Surrebuttal Testimony?**

8 A. I have read the rebuttal testimony filed in this case and will respond to certain testimony
9 provided by Staff witness Gateley.

10

II. RESPONSE TO STAFF TESTIMONY

11 **Q. On p. 4 of his Rebuttal Testimony, Staff witness Curt Gateley criticizes your report**
12 **in that “the site was not visited and that it relied upon information from Eureka and**
13 **MAWC.” He further states that he does not “know why physical verification of the**
14 **mechanical condition of the above-ground utility assets wasn’t conducted.” Have you**
15 **had an opportunity to view the mechanical conditions of the above-ground assets?**

16 A. Yes. I visited Eureka on Thursday, December 9, 2021, along with Steve Miller and Brian
17 Eisenloeffel from Missouri-American Water Company. We were led to the sites by David
18 Scott of the City of Eureka.

19 **Q. Specifically, what assets did you have an opportunity to view?**

20 A. I visited the wastewater treatment plant, where I observed the above ground assets
21 including the influent pump station building, the 3-cell lagoon, the blower building, and

1 UV system. The UV system was not in operation due to the time of year. We also visited
2 several other sites including:

- 3 • The Arbors well, treatment, tank, and booster;
- 4 • Niehoff/Augustine tank and booster;
- 5 • Howerton Road well and treatment;
- 6 • Viola well, treatment, tanks, and boosters;
- 7 • Cahoon lift station;
- 8 • Kircher (Stonebridge) lift station; and,
- 9 • Truitt (Raineri) lift station.

10 **Q. Does anything you observed in regard to the above-ground wastewater system assets**
11 **change your opinion of those assets?**

12 A. No. I did not see anything that would change my previous high-level opinion of the
13 condition of the assets.

14 **Q. What did you observe?**

15 A. At the wastewater treatment plant, I observed the condition of the screen in the influent
16 pump station building, the berms around the lagoons, the diffuser piping that was visible
17 in the lagoons, the Aquamats® that were visible in the lagoons, the equipment in the blower
18 building, the generator, and the UV equipment (which only operates seasonally as needed
19 – typically April to October). The assets appear to be in working order and in good
20 condition. The generators at the various sites are fully or nearly fully depreciated but
21 appear to be in good to very good condition. Newer assets at the Niehoff tank and booster
22 and the Arbors well, treatment, tank, and booster also appear to be in very good condition.

1 The Viola storage tanks and pumps are fully depreciated, still in operation and appear to
2 be in good condition. The softening equipment at the Viola site appears to be in very good
3 condition. Older assets such as the Cahoon lift station and Stonebridge lift station, which
4 are fully depreciated, but still in operation appear to be in poor to fair condition due to their
5 age.

6 **Q. Having viewed the system, what is your opinion?**

7 A. Overall, the system appears to be in good condition.

8 **Q. Does this conclude your Surrebuttal Testimony.**

9 A. Yes, it does.