OPC 0043 Supplemental

DATA INFORMATION REQUEST
Missouri-American Water Company
WU-2017-0296

MAWC Exhibit No. 23
Date 9/27/17 Reporter MR
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Requested From: Tim Luft
Date Requested: 8/2/17

Information Requested:

Reference direct testimony of Naumick p. 13, lines 13-16 wherein the witness states "[o]ur processes were further refined following data verification and evaluation of an intensive monitoring program during replacement work performed by American Water subsidiaries in New Jersey and Illinois." Explain how the "process" occurred before the update and describe the changes to the "process" (including the date the new "process" was implemented).

Requested By: Timothy Opitz – Office of Public Counsel – timothy.opitz@ded.mo.gov

Information Provided:

The following describes key steps in developing the process for full lead service line replacement.

- In the spring of 2016, American Water Works Service Company ("Service Company") began a review process of the approach to mitigating lead in drinking water.
- Service Company issued flushing guidance to the state operating companies in April 2016 for use whenever a lead service line or lead gooseneck was encountered during construction.
- The scope for pilot assessment work was developed in the summer of 2016.
- One system in New Jersey and one system in Illinois were identified to confirm the practicality of deploying the recommended protocol and to identify gaps, if any, in the protocol.
- The local operations in these two service areas then identified customers to participate in the pilot assessment work
- During the fall of 2016, the company worked with the identified customers to educate them about the lead service line replacement process, schedule the work, and engage them in the flushing and sampling steps.
- Targeted lead service line replacements and associated sampling continued through early 2017.
- An access agreement template was developed for the affliated utilty companies for their use to facilitate working on customer property. Each affiliated company then refined the template as needed per their state legal requirements.

- Additional customer communication materials are being rolled out in 2017 with Spanish translations. (i.e., door hangers to remind the customer to return their water samples, scripts for calling customers prior to the start of work, and similar)

After the assessment, improved the protocol, tested our assumptions about how to organize the work, and verified that the flushing protocol was protective. The following outcomes were also achieved:

- Gained a better understanding of the advanced planning needed to identify if the customer owned portion of service line is lead, contact the customer, explain the process, and answer their questions.
- Gained a better understanding of how local officials would like to be kept informed of this work
- Developed targeted "Frequently Asked Questions" to be included in our program materials for customers
- Achieved a sense for the ease or difficulty of performing the flushing protocol (customer performed vs. need to have a plumber perform)
- Achieved a sense of the ease or difficulty in removing and cleaning faucet aerators
- Gained a better understanding of the customer's willingness to take water samples.
- Gained a better understanding of how to engage the customer in managing their household plumbing after the lead service line was replaced.
- Identified and established guidance for dealing with potential issues when replacing the full service line rather than just the portion from the main to the curbstop, such as how to deal with premise electrical system grounding, the need for the customer to be home, the amount of time needed for the work to be completed and similar level of project details.
- Improved understanding of how the contractor can successfully interact with the customer.

Supplemental Information Provided:

The process changes are included in the 2017 work flow discussed in testimonies from Mr. Naumick and Mr. Aiton. Specifically, the pre-work sample in the 2016 work in NJ and IL was difficult to schedule and provided little value in the analysis of the effectiveness of the flushing. As a result, the pre-work sample was removed from the recommended process. The flushed sample provided value in determining if the flush time and velocity were adequate. Therefore the flush sample was kept in the recommended procedure as described in the Company witnesses' testimony. The still sample was also deemed of value and kept in the recommended process. Other factors encountered during the testing helped to refine the protocol that is discussed in the Company witnesses' testimony. These included how to proceed if aerators can not be removed, if home treatment units are in place, if drains are too slow and similar logisitical issues as well as how best to communicate with the customer through the process.

Responsible Witness: Gary Naumick