

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

In the Matter of the Application of Rate)
Increase Request for Liberty Utilities (Missouri) **File No. WR-2018-0170**
Water) LLC d/b/a Liberty Utilities)

**LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF CROSS-
EXAMINATION AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for this *List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements (Issues List)* hereby states:

In preparing this *Issues List*, Staff has solicited input from the parties, attempted to list all the issues, and attempted to obtain consensus on the descriptions of the issues. This is Staff’s best effort to list and describe all the issues in this case. To the extent errors in issues or listed witnesses are discovered, the Commission will be advised as soon as possible. All parties do not agree that the issues listed herein are actually issues in this case. In order to prevent the need for filing multiple lists of issues, the parties have agreed to include all issues whether agreed to by opposing parties.

The parties:

Liberty Utilities – Liberty Utilities (Missouri Water) LLC d/b/a Liberty Utilities

OPC – The Office of the Public Counsel

Staff – Staff of the Commission

SLR & OLCC – Silverleaf Resorts, Inc., and Orange Lake Country Club, Inc.

OMCA – Ozark Mountain Condominium Association, Inc.

List of Issues

1. Cost of Service – What is the appropriate cost of service for Liberty Utilities?
 - a. Return on equity – What is the appropriate return on equity for Liberty Utilities?
 - b. Capital structure – What is the appropriate capital structure for Liberty Utilities?
 - c. Rate case expense – What is the appropriate amount of rate case expense and amortization period?
2. Customer Service Issues – Has Liberty Utilities adequately responded to customer service issues?
3. Rate Design – What is the proper rate design for the various Liberty Utilities water and sewer systems?
 - a. Phase-In of Rates – Should rates for Holiday Hills, Ozark Mountain, and Timber Creek service areas be phased-in over a period of five years? Should carrying costs be allowed to be recovered if rates are phased-in?
 - b. Customer Charge – What is the appropriate customer charge?
 - c. Commodity Charge – What is the appropriate commodity charge?
4. Silver Leaf / Orange Lake Exemption – Should Silverleaf / Orange Lake be exempted from consideration in a subsequent rate case?

HEARING SCHEDULE

Hearings will start each day at 9:00 am and, to the extent possible given schedule constraints, issues will be handled upon the conclusion of the preceding issue. The parties intend to maintain this hearing schedule and acknowledge that it may be necessary to hold hearings after 5pm.

Thursday, August 16

Preliminary Matters

Opening Statements

- Liberty Utilities
- Staff
- SLR & OLCC
- OMCA
- OPC

Cost of Service

Return on Equity & Capital Structure

- Magee – Liberty Utilities
- Murray – Staff
- Stannard – SLR & OLCC

Rate case expense

- Schwartz – Liberty Utilities
- Harrison – Staff
- Stannard – SLR & OLCC

Customer Service Issues

- Allsbury – OMCA
- Parish – Staff
- Roos – Staff
- Schwartz – Liberty Utilities

Rate Design

Phase-In of Rates

- Stannard – SLR & OLCC
- Schwartz – Liberty Utilities
- Busch – Staff

Customer Charge & Commodity Charge

- Schwartz – Liberty Utilities
- Barnes – Staff
- Stannard – SLR & OLCC

Silverleaf / Orange Lake Exemption

- Stannard – SLR & OLCC
- Schwartz – Liberty Utilities
- Busch – Staff

Friday, August 17

Continue unfinished testimony

ORDER OF CROSS-EXAMINATION

The parties identified below are parties that have pre-filed testimony. A different order of cross-examination may be more appropriate for specific issues, however, the following orders of cross-examination are generally based on adversity:

Liberty Witnesses

Staff, OMCA, SLR & OLCC, OPC

Staff Witnesses

Liberty Utilities, OMCA, OPC, SLR & OLCC

SLR & OLCC Witness

OPC, OMCA, Liberty Utilities, Staff

OMCA Witness

SLR & OLCC, OPC, Staff, Liberty Utilities

WHEREFORE, Staff respectfully submits this *Amended List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements*, on behalf of itself and the parties referenced herein.

Respectfully submitted,

/s/ Jacob T. Westen

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and or counsel of record on this 10th day of August, 2018.

/s/ Jacob T. Westen