

EXHIBIT NO.
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.**

