

Exhibit No.:
Issues: UPIS Additions, Blendville Water
Treatment Plant (BWTP) Improvements
Witness: Kevin H. Dunn
Exhibit Type: Direct
Sponsoring Party: Missouri-American Water Company
Case No.: WR-2008-XXXX
SR-2008-XXX
Date: March 31, 2008

MISSOURI PUBLIC SERVICE COMMISSION

**CASE NO. WR-2008-XXXX
CASE NO. SR-2008-XXX**

DIRECT TESTIMONY

OF

KEVIN H. DUNN

ON BEHALF OF


MISSOURI-AMERICAN WATER COMPANY

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

IN THE MATTER OF MISSOURI-AMERICAN)	
WATER COMPANY FOR AUTHORITY TO)	
FILE TARIFFS REFLECTING INCREASED)	CASE NO. WR-2008-XXXX
RATES FOR WATER AND SEWER)	CASE NO. SR-2008-XXX
SERVICE)	

AFFIDAVIT OF KEVIN H. DUNN

Kevin H. Dunn, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Kevin H. Dunn"; that said testimony and schedules were prepared by him and/or under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge.



Kevin H. Dunn

State of Missouri
County of St. Louis
SUBSCRIBED and sworn to
Before me this 19th day of March 2008.



Notary Public

My commission expires:

Staci A. Olsen
Notary Public - Notary Seal
State of Missouri
St. Charles County
Commission # 05519210
My Commission Expires: March 20, 2009

**DIRECT TESTIMONY
KEVIN H. DUNN
MISSOURI-AMERICAN WATER COMPANY
CASE NO.WR.2008.XXXX
CASE NO.SR.2008.XXXX**

TABLE OF CONTENTS

I.	Witness Introduction	1
II.	UPIS Additions	3
III.	Blendville Water Treatment Plant (BWTP) Improvements	10

DIRECT TESTIMONY

Kevin H. Dunn

WITNESS INTRODUCTION

1 **Q. State your name and business address.**

2 A. My name is Kevin H. Dunn and my business address is 727 Craig Rd., St. Louis,
3 MO 63141.

4

5 **Q. By whom are you employed and in what capacity?**

6 A. I am employed by Missouri-American Water Company ("MAWC" or "Company")
7 as Director, Engineering.

8

9 **Q. What is your educational background?**

10 A. I received my Bachelor of Science degree in Civil Engineering from the University
11 of Missouri - Columbia in 1984.

12

13 **Q. Are you a licensed professional engineer?**

14 A. Yes, I am a registered Professional Engineer in Missouri.

15

16 **Q. Do you hold other related water certificates?**

17 A. Yes, I have Class A and DSIII Public Water Supply Operator Certificates from the
18 Missouri Department of Natural Resources.

19

1 **Q. Please describe your business experience in the water utility industry.**

2 A. In 1984, I began work with St. Louis County Water Company as a System
3 Engineer. This work included the various designs and relocations and
4 installations of mains throughout St. Louis County. From 1989 to 1994, I was in
5 charge of various water treatment plant facility operations, maintenance and
6 capital projects, leading to being Superintendent of all St. Louis County water
7 treatment facilities. In August of 1994, I was transferred back into Engineering,
8 first as Special Projects Engineer and then Superintendent of Production
9 Engineering where I oversaw or performed the project management of various
10 major water treatment facility upgrades, depreciation studies, planning studies to
11 match future growth, and maintenance studies to determine life cycle
12 replacements. With the merger with Missouri-American Water Company in 1999,
13 I performed this similar role under the title of Engineering Manager and I was
14 responsible for the eastern districts in Missouri which were St. Louis County, St.
15 Charles, Mexico, and Jefferson City. In 2002, I was promoted to Director of
16 Engineering for Missouri and became responsible for all the capital projects and
17 planning for all of the Missouri Districts. In 2004, I was promoted to American
18 Water, Central Region Director, Production, where I was responsible for all water
19 and waste water treatment facilities in the Central Region. This mainly consisted
20 of directing the treatment operations and maintenance work for the American
21 Water districts located in Missouri, Illinois, Iowa, Indiana, Ohio, and Michigan. In
22 late 2007, I was transferred to my current role as Director, Engineering for
23 MAWC.

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Q. What is the purpose of your testimony?

A. The purpose of this testimony is to describe the Company's investments in and additions to Plant in Service since MAWC's last rate case. In addition, I will discuss the status of the Company's Joplin Production Improvement Project.

UPIS ADDITIONS

Q. What are MAWC's expected investments in Plant In Service through September 30, 2008?

A. The anticipated investments in capital additions, by District, are indicated in the table below:

Anticipated Investments thru September 2008	
Brunswick	395,573
Jefferson City	2,692,519
Joplin	32,506,677
Mexico	1,899,594
Platte County	6,953,888
St. Charles	5,872,188
St. Joseph	5,571,915
St. Louis County	91,503,333
Warrensburg	2,181,081
Warren County Water	148,370
Cedar Hill Sewer	20,619
Parkville Sewer	1,231
Warren County Sewer	28,502
TOTAL	149,775,492

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Q. Please list the significant capital projects that are or will be completed during this proceeding.

A. Significant individual projects at each district are as follows:

1 Brunswick

- 2 • Replace Lime Feeder
- 3 • Replace Well #1 Pump Motor
- 4 • Complete 6" & 8" main on Mulberry Street
- 5 • Replace 6" main on S. Small Street with 350 ft of 6" main.

6 Jefferson City

- 7 • Install Treatment Plant Standby Generator
- 8 • Purchase of Distribution Building
- 9 • Replace Filter Media for Filters 7 & 8
- 10 • Replace 2" main on Bolton Dr with 1695 ft of 8" main
- 11 • Replace 6" main on Riverside Dr with 1400 ft of 8" main
- 12 • Replace Dust Collector System for Carbon and Lime
- 13 • Replace Low Service Pump #5

14 Joplin

- 15 • Blendville Water Treatment Plant Improvements
 - 16 ○ Construct Plant Chemical Feed Building, which includes:
 - 17 ▪ On-site Hypochlorite Generation System
 - 18 ▪ Aqua Ammonia System
 - 19 ▪ Alum System
 - 20 ▪ Fluoride System
 - 21 ▪ Liquid Lime System
 - 22 ▪ Carbon Slurry System
 - 23 ▪ Filter Aid Polymer System

- Construct Water Treatment Plant 2, which includes:
 - Stage 1 Flocculator tank with mixers
 - Stage 1 clarifier tank with plate settlers
 - Stage 2 Flocculator tank with mixers
 - Stage 2 clarifier tank with plate settlers
 - Two 2.75 MGD Dual Media Filters with air scour wash system
 - Construct Administration Building housing the Operator Control Room, the Wet Chemistry and Bacteriological Laboratories, and Supervisory Offices.
 - Construct One MG Clearwell No. 2
 - Install New Incoming Electrical Service, which includes:
 - Incoming Switchgear
 - 1.25 MW Generator
 - Install Vertical Turbine Transfer Pump Station
 - Install Four - Nine MGD Ultraviolet reactors
 - Rehabilitate High Service Pumps and Electrical Service
 - Replace Aldrich Units Filter Gallery valves.
 - Construct Washwater Equalization Basin and Pump Station
 - Install Aldrich Units De-Icing system
 - Construct an Additional Water Treatment Residual Lagoon
- Install 1694 ft of 12" main on St. Louis Ave from Falcon Road to Hwy 171
 - Replace 2" main on Salem Road with 1373 ft of 8" main

- Install Fluoride Feed at the Well Sites

Mexico

- Install Residuals Basin No. 2
- Install Settling Basin Effluent Improvements
- Replace 6" main on Randy Street with 950 ft of 6" main
- Replace 4" main on S. Clark Street with 3,277 ft of 8" main
- Replace 6" main on Eagle Drive with 950 ft of 8" main
- Replace 6" main on Falcon Drive with 975 ft of 8" main
- Replace two lime feed machines at the water treatment plant

Platte County

- Install 11,000 ft of 12" main to improve the Northwestern portion of the system
- Install Well Field and Plant Standby Generator
- Install 14,000 ft of 24" and 6,465 ft of 20" to improve the system from the plant to the City of Riverside
- Replace Treatment Plant Backwash Pump

St. Charles

- Relocate 4280 ft of 12" main on St. Peters Howell Rd
- Several Main Relocations resulting from Public Works Improvements
- Replace roof at the Weldon Springs Booster Station
- Install new pump with VFD at the Camelot Booster Station

St. Joseph

- Install Lime Softening System Slaker Addition

- Install approximately 18,250 ft of 12" main to the Agency Zone
- Purchase five portable generators for various booster stations
- Replace 2" main on W. Buddy Street with 1125 ft of 8" main
- Replace 1-1/2" main on E. Buddy Street with 570 ft of 8" 45 ft of 6" and 413 ft of 2" main
- Replace 6" and 2" main on Colorado Street with 890 ft of 8" main
- Install 381 ft of 8" main on LaVina Drive to tie in two dead-end subdivisions
- Construct improvements to Well Pumps # 1, 4, 5, 6, and 7

St. Louis County

- Complete several Main Relocations resulting from Public Works Improvements
- Complete various main relocations in conjunction with the Rte 40/I-64 Missouri Department of Transportation project
- Replace mains as part of the obsolete main replacement program
- Install Meramec and South Plant On-site Hypochlorite Generation System
- Construct Central Plant Coagulation Basin #4 Flocculation and Clarifier Equipment Replacement
- Install North Plant Incoming Electrical Switchgear Improvements
- Install Standby Generator at North Plant
- Install Central Plant Incoming Electrical Switchgear Improvements
- Install Service Center Site Improvements

Warrensburg

- Install 1588 ft of 16" and 500 ft of 12" main on Holden Street and Russell Avenue
- Replace roof at the plant
- Install 1584 ft of 8" main on W. Hale Lake Road
- Replace 6" main on Burkarth Road with 2400 ft of 8" main
- Upgrade communication to well sites
- Install 400 ft of 12" main on Enterprise Drive.

Warren County Water

- Install Standby Generator at Well House

Cedar Hill Sewer

- Construct Waste Water Treatment Plant Improvements

Warren County Sewer

- Install Sewer Grinder system on Waste Water Treatment Plant No. 1 & 2
- Rebuild Lift Station No. 1 at Golf Course
- Relocate blowers on Waster Water Treatment Plant No. 1 & 2
- Install Standby Generators at various Lift Stations

Q. Could you provide an explanation of those items involved with the Joplin Production Improvement Project?

A. Yes. Mr. Alan DeBoy previously discussed the need for these items in his Direct Testimony in the Company's last rate case (Case No. WR-2007-0216). Briefly, the primary drivers for the Joplin Production improvements are to enhance reliability of aging production infrastructure, meet the increase in system demand,

1 and meet environmental and source water regulations. This project addresses
2 these needs by rehabilitating or rebuilding existing infrastructure at both the
3 source of supply and the treatment plant and installing new treatment facilities at
4 the plant. This project will replace the worn and aged equipment of the existing
5 plant to increase reliability and increase production capacity to meet the
6 projected maximum day demands through 2021. The total cost for this project
7 was estimated at \$44 million.

8 **Q. Which items of this Project were completed in time to be included in the**
9 **previous rate case?**

10 A. Items completed in the previous rate case included those items at the source
11 supply and the connection between the source and the treatment plant, along
12 with distribution system improvements. This would be the replacement of the
13 Shoal Creek intake with a new intake pumping station, replacement of the intake
14 cribs in Shoal Creek, the suction piping from the crib to the pump station, the
15 addition of a raw water transmission main, and distribution piping configuration
16 that allows the well system the ability to provide water into the main pressure
17 zone when needed. The total cost of these projects which were included in utility
18 plant, in the previous case, was \$10,016,781.

19 **Q. Please list and provide additional detail concerning the components that**
20 **are to be completed during this case.**

21 A. Following are descriptions of those components that are expected to be in-
22 service by the end of September 2008:
23

BLENDVILLE WATER TREATMENT PLANT (BWTP) IMPROVEMENTS

Pretreatment and Filtration – Existing Plant

The existing flocculation, sedimentation basin, and purification units will provide treatment as in the past. A static mixer will be provided to improve coagulant addition, a filter aid system will be constructed for the existing filters, and the existing filter gallery valves and valve operators, flow meters, and controls will be replaced.

Chemical Building and Mixing Improvements

A chemical building will be constructed to house a raw water flow control valve, flow meter, bulk storage of chemicals, day tanks, transfer pump, chemical metering pumps, feed piping and controls, and static mixer.

Administrative Building

An Administration section was added between the chemical feed building and Plant 2 that houses the Operator Control Room, the Wet Chemistry Laboratory, the Bacteriological Laboratory, Supervisory Staff Offices, and the Break Room/Training Room.

Transfer Pumping and UV Facilities

The Company proposes to integrate the UV facilities downstream of filtration. A transfer pumping step is proposed at BWTP to provide adequate head for the UV disinfection process and to enable full use of the existing clearwell.

Clearwater Storage and High Service Pumping

1 A 1,000,000 gallon ground storage tank will be installed for additional finished
2 water storage and improved service delivery reliability. The tank will be a ground
3 tank located after the transfer pump station and this will ensure a positive head
4 on the existing high service pumps.

5
6 The existing high service pumps #7 and #10 will be replaced to provide
7 approximately 22 MGD of reliable pumping capacity.

8 **Electrical Improvements**

9 The existing 480 volt electrical service will be replaced and upgraded to
10 accommodate the projected loads of the facilities. The existing switchgear will be
11 replaced. A diesel powered generator will be installed to provide auxiliary
12 electrical power for distributive pumps, transfer pumps, UV, and ancillary loads
13 during power interruptions so that 12 MGD can be delivered to the system.

14 **Process Control**

15 A new instrumentation and control system will be installed at BWTP to monitor
16 and control the raw water pumping facilities, treatment processes, and allow
17 monitoring of the distribution system. Each of the facilities will include flow
18 meters, pressure transmitters, level transmitters and other baseline type
19 monitoring equipment to allow the operations staff to monitor and control facilities
20 at BWTP and Shoal Creek facilities. Continuous water quality monitoring
21 equipment will also be provided to track water quality trends.

22 **Treatment Residuals**

1 Basin blowdown, filter backwash, and other treatment residual streams will be
2 transferred to the Shoal Creek lagoon(s) through the existing 16" raw water main.
3 The 16 inch main will be converted from raw water service to permanent
4 residuals handling service.
5 A second lagoon will be constructed at Shoal Creek to allow for filter wash water
6 storage and clarification prior to recycling the decant back to the head of the
7 treatment process.

8 **Treatment Capacity Improvements**

9 Treatment capacity improvements will be constructed on property adjacent to the
10 new chemical building. The new flocculation/sedimentation basins and filtration
11 facility (Water Treatment Plant 2) operates in parallel with the existing BWTP.

12 Flocculation and Clarification

13 This basin will consist of two stage treatment (mixing, flocculation, and
14 sedimentation), stage one contains two stages of flocculation followed by plate
15 settlers with automated sludge removal. Stage two is identical to the first stage.
16 The effluent of the first stage will be returned to the second stage. The basin
17 inlet can be directed to either stage and either can be by-passed to allow for
18 maintenance.

19 Filtration

20 Two new 2.75 mgd filters will be installed.

21 Housing

1 Due to the relatively small size of the flocculation and sedimentation facilities and
2 desire for improved security and prevention of basin ice cover, the basins and
3 filters shall be enclosed within a building.

4 **Q. What is the expected cost and schedule for these projects?**

5 A. The above work is scheduled to be completed and in service by the end of
6 September 2008, at a total cost of approximately \$31.8 million.

7 **Q. Will this work complete the Joplin Production Improvement Project?**

8 A. No, there remains approximately \$2.2 million of work that will likely not be
9 completed by the end of September. This work includes high service pump and
10 valve replacements, clearwell #1 tie-ins, Plant 1 filter aid feed and de-icing
11 system, the distribution building to replace the space now used by production,
12 and final site clean-up, landscaping, and paving. The current schedule is to have
13 most of the work completed by November 2008, with the possible exception of
14 landscaping and paving being completed in spring 2009.

15 **Q. Does this conclude your testimony?**

16 A. Yes.