

Exhibit No.:
Issues:
Witness: Jim R. Krewson
Sponsoring Party: Intercounty Electric Cooperative
Type of Exhibit: Rebuttal Testimony
Case No.: EA-2000-308

INTERCOUNTY ELECTRIC COOPERATIVE ASSOCIATION

REBUTTAL TESTIMONY

OF

JIM R. KREWSON

FILED
JUL 18 2000
Missouri Public
Service Commission

July 2000
Licking, Missouri

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of the City of)
Rolla, Missouri, for an Order Assigning Exclusive)
Service Territories and for Determination of Fair) Case No. EA-2000-308
and Reasonable Compensation Pursuant to)
Section 386.800, RSMo 1994)

AFFIDAVIT OF JIM R. KREWSON

STATE OF MISSOURI)
) ss.
COUNTY OF TEXAS)


I, Jim R. Krewson, of lawful age, being duly sworn, do hereby depose and state:

1. My name is Jim R. Krewson. I am presently the Manager of Operations and Maintenance for Intercounty Electric Cooperative Association, a party in the referenced matter.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.


Jim R. Krewson

Subscribed and sworn to before me, a Notary Public, this 14 day of July, 2000.

My Commission expires:


Notary Public

12-9-01

SUSAN L. PARISH NOTARY PUBLIC
State of Missouri
County of Texas
My Commission Expires Dec. 9, 2001

INTRODUCTION

1 Q. Please state your name for the record please.

2 A. Jim Krewson

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

4 A. I am employed by Intercounty Electric Cooperative Association as the Manager of
5 Operations and Maintenance.

6 Q. Please briefly describe the duties of that position and your professional background.

7 A. I am responsible for the overall plant construction and maintenance of the distribution
8 electric system and facilities. I have been the department Manager since 1995. Prior to that
9 time I was a senior staking engineer in the Engineering Department. I have approximately
10 31 years of experience in electric utility plant operations.

11 Q. To whom do you report?

12 A. I report directly to the General Manager, Mr. Vernon Strickland.

13 Q. Please briefly describe your educational background.

14 A. I am a high school graduate with some college courses and have attended numerous
15 educational programs and seminars related to the operation of electric systems.

16 **PURPOSE**

17 Q. What is the purpose of your testimony here today?

18 A. The purpose of my testimony is to affirm that the information shown in the studies by Mr.
19 Nelson and Mr. Ledbetter, is reasonable and within the maintenance and operational
20 experience at the cooperative.

21 Q. Did you participate in the production of any of the studies attached to Mr. Nelson's or Mr.
22 Ledbetter's direct testimony?

1 A. Yes, I conferred with both on the issues presented in their testimonies and reviewed the
2 figures supplied by the accounting department for actual labor and material costs experienced
3 by the cooperative.

4 Q. Have you reviewed their studies?

5 A. Yes, I am familiar with their testimony.

6 Q. Do you have experience in the type of construction described in their studies?

7 A. Yes.

8 Q. In your opinion, are the construction and transfer approach, and the amounts attributable to
9 Mr. Ledbetter's and Mr. Nelson's proposals, reasonable?

10 A. Yes, based on my experience managing the electric utility plant construction and
11 maintenance, in order to build a safe and reliable system and with the least amount of
12 inconvenience to the members, they are.

13 ***JOINT USE OF FACILITIES***

14 Q. Have you reviewed the direct testimony prepared by the City of Rolla (Rolla) and Rolla
15 Municipal Utilities (RMU). .

16 A. Yes.

17 Q. What was your opinion of their proposals for sharing facilities?

18 A. I have several concerns over the testimony by RMU's witnesses, who propose the joint use
19 of facilities if the transfer of facilities and territory is approved. The first is that by having
20 two very different electrical systems on the same poles, with different controlling operators,
21 will cause numerous operational and maintenance problems that do not exist today for both
22 the City of Rolla and Intercounty.

1 The second is that Intercounty crews will be required to work around and through the
2 RMU's system thereby increasing the need for more expensive equipment and creating
3 additional safety problems for Intercounty and the general public. I do not see how this
4 could be in the public interest.

5 Based on my experience, I believe it would be much safer for RMU to reroute their
6 new lines so as not to create joint use problems. Also, if the Commission required
7 Intercounty to make this change, any replacement of its wires on the poles provided by RMU
8 would probably be with a new and larger size conductor.

9 I could not find any information in RMU's feasibility study where these options were
10 considered or the resulting cost for necessary outages, or for system cover up time and
11 expenses. I have no way of estimating the impact this would have on our members while this
12 type of work would be progressing.

13 Q. Does this conclude your direct testimony?

14 A. Yes, at this time.