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Data Center
Missouri Public
Service Commission

Exhibit No. 240

OPC – Exhibit 240
DR 0075.1
File No. WR-2023-0006

Missouri Public Service Commission

Respond Data Request

Data Request No.	0075.1
Company Name	Confluence Rivers Utility Operating Company, Inc.-(Water)
Case/Tracking No.	WR-2023-0006
Date Requested	5/11/2023
Issue	General Information & Miscellaneous - Other General Info & Misc.
Requested From	Aaron Silas
Requested By	Travis Pringle
Brief Description	Questions specific to chemicals purchased for water systems
Description	<p>Please refer to Company's response to Staff DR 75 1. Identify all individuals by name, employing entity and job title that are responsible for the decision to purchase chemicals used for water systems in bulk. This should include any individual that is a representative of a third party and any employee of Confluence Rivers Utility Operating Company. 2. Describe the exact process for how chemicals are purchased for Missouri water systems. Such a description should include but not be limited to the following: (A.) Over what time period does a bulk chemical purchase last? (B.) Are visual inspections of chlorine levels documented and reviewed? (C.) How are the bulk quantities distributed to each separate water systems? (D.) Does Confluence Rivers procure its chemicals directly from vendors or through third parties? (1.) If it is through third parties, provide the entity names and provide the markup percentages charged on top of the actual cost of the chemicals for this service. (2.) If it is directly from a vendor that manufactures and/or distributes chemicals identify these entities. 3. List, identify and explain in detail all impediments that exist that would prevent a Confluence River Utility Operating Company or a third party operator from documenting the quantity of chemicals that are used at each separate water system on a quarterly basis. If no real impediments exist, indicate if this is something that can be accomplished on a going forward basis. 4. Many invoices supplied to Staff do not show quantity or price per unit of bulk chemicals on the invoice documentation provided. (A.) List all individuals at Confluence Rivers Utility Operating Company (employee name and job title) that are responsible for verifying that the amount of chemical purchased in bulk is accurate and properly charged prior to issuing payment. (B.) Describe the exact process these individuals undertake to determine the quantity and price are accurate for each bulk chemical invoice? Explain separately for instances when quantity and price is reflected on the invoice and for instances when quantity and price are not reflected on the invoice. (C.) How and where do these individuals document the quantity and price when it is not properly reflected on the invoice? Provide a copy of all such documentation that indicates the actual quantity and price for each bulk chemical purchase where quantity and price are not properly reflected on the invoice. (D.) List and explain all impediments that exist that would prevent Confluence Rivers Utility Operating Company from requiring that all invoices properly reflect quantity and cost per unit of chemicals purchased on all invoices that are received. If no real impediments exist, is this something that can be accomplished on a going forward basis. 5. How are bulk chemical purchase costs allocated to each separate water system? Provide the allocation factors showing all calculations and explain the rationale for each such allocation factor. Requested by: Paul Amenthor (paul.amenthor@psc.mo.gov)</p>
Response	<p>1. Todd Thomas, Senior VP Central States Water Resources 2. Please see the Company's responses below for a description of the process for how chemicals are purchased: (A.) Chemical usage can</p>

vary throughout the year. Confluence Rivers bulk chemical deliveries range from 4-6 months apart. (B.) Yes, chlorine levels are documented by third-party contractors and reviewed by CSWR EHS team members. (C.) Bulk quantities are distributed on an as needed basis, based on the documented chemical levels from the visual inspections. (D.) Confluence procures chemicals directly through the vendor when possible. There are instances where the chemicals cannot be delivered and the third-party operators need to physically pick up the chemical. (D.) (1.) If Clearwater Solutions is utilized there is a 10% markup. (D.) (2.) If chemicals are purchased directly from the vendor, Hawkins is utilized. 3. No impediments; this can be accomplished on a going-forward basis. 4. (A.) Brad Thibault, Regional Manager 4. (B.) Price is set by the vendor and the vendor has an internal tracking mechanism that calculates the quantity of chemical delivered to the Confluence Rivers sites. This process is utilized regardless of the instance. 4. (C.) The quantity and cost per unit of chemicals is documented on Hawkins invoices. 4. (D.) No such impediments, the quantity and cost per unit of chemicals is documented on Hawkins invoices. 5. Invoices include the service areas for which the bulk chemicals are purchased. Cost for the bulk chemicals is divided equally amongst the listed service areas on the invoice.

Objections

NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **WR-2023-0006** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Confluence Rivers Utility Operating Company, Inc.-(Water)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Confluence Rivers Utility Operating Company, Inc.-(Water)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security :

Public

Rationale :

NA



CONFLUENCE RIVERS

Utility Operating Company

A CSWR Managed Utility

Missouri Verification:

I have read the Information Request and answer thereto and find answer to be true, accurate, full and complete, and contain no material misrepresentations or omissions to the best of my knowledge and belief; and I will disclose to the Commission Staff any matter subsequently discovered which affects the accuracy or completeness of the answer(s) to this Information Request(s).

Signature /s/ *Aaron Silas*
Director Regulatory Affairs