

*Exhibit No.:*  
*Issue(s):* Capital Improvements  
*Witness:* Daronn A. Williams  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Direct Testimony  
*Case No.:* WR-2023-0344  
*Date Testimony Prepared:* October 10, 2023

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**WATER, SEWER & STEAM DEPARTMENT**

**DIRECT TESTIMONY**

**OF**

**DARONN A. WILLIAMS**

**THE RAYTOWN WATER COMPANY**

**CASE NO. WR-2023-0344**

*Jefferson City, Missouri*  
*October 2023*



1           A.     RWC is a Missouri corporation, which was established in 1925 by  
2 Neal Clevenger's grandfather. Neal is currently the President of the Company and oversees the  
3 daily operations. Chiki Thompson is the Vice-President but she also serves many other roles  
4 within the Company. RWC provides water utility service to commercial and  
5 residential customers in the City of Raytown with a small portion of its customers being  
6 in the City of Independence. RWC reported 6,541 metered connections, per Data Request  
7 ("DR") 0092.

8           Q.     Can you describe the operations of the Company?

9           A.     RWC operates under water permit MO1010676, issued by DNR, and purchases  
10 100% of its water from Kansas City Public Water Supply ("KC"), which operates under  
11 DNR permit MO1010415. Water is received through any of eight metered connections which  
12 can be opened and closed as needed. Seven of the connections are six-inch water meters and  
13 the other is a four-inch water meter. The metering structures are owned by RWC but the meters  
14 themselves are owned by KC. RWC also has three elevated storage tanks that are used to serve  
15 the customers. Water is distributed to the customers through approximately 379,210 feet of  
16 water main of various sizes and materials. Most of the water main, 318,941 feet (84%), is cast  
17 iron. The rest of the distribution system is made up of various materials of pipes including:  
18 galvanized iron, polyvinyl chloride (commonly known as PVC), ductile iron, and copper pipe.  
19 The pipes range in size from two inches to twelve inches in diameter.

20          Q.     Does RWC have a purchase water agreement with KC?

21          A.     Yes. On July 14, 2022, RWC signed a twenty-year Purchase Water Agreement  
22 with KC. This agreement guarantees RWC up to three million gallons of water per day  
23 ("MGD") under normal operating conditions. RWC customers use an average of 1.1 MGD.

Direct Testimony of  
Daronn A. Williams

1 Q. Did Staff perform an inspection of the water system?

2 A. Yes, Staff inspected the water system on April 26, 2023. At the time of Staff's  
3 inspection, the facilities appeared to be operating appropriately.

4 Q. Is RWC in compliance with DNR?

5 A. Yes. Staff reviewed DNR records from a sunshine request. The Company was  
6 last inspected on November 30, 2022 by DNR staff. DNR wrote an inspection report from this  
7 inspection, dated December 27, 2022. Per this inspection report, RWC was found in compliance  
8 with Missouri Safe Drinking Water Laws and Regulations.

9 Q. Please describe RWC's meter replacement program.

10 A. RWC is in the process of replacing aging, conventional meters with Advanced  
11 Metering Infrastructure ("AMI") meters through a contract with Utility Services Co., Inc.  
12 ("USC") for a total contract price of \$3,870,050 for the installation of 6,811 AMI meters. In  
13 addition to the installation of the new AMI meters that began in March 2023, USC installed  
14 Data Collector Units (DCUs), provided RWC with host software and communications services  
15 to collect data from all the DCUs, provided RWC with the Aclara Adaptive Consumer  
16 Engagement platform, and procured all the equipment required for installation. As of June 30,  
17 2023, USC had installed 3,073 AMI meters, or approximately 45.12% of the total to be  
18 installed. Most residential meters (which are typically five-eighths inch in size) need to be  
19 tested, inspected, and/or replaced at least every 10 years.<sup>1</sup> However, the new meters by  
20 USC come with at 15-year warranty.

21 Q. Has the purchase of these AMI meters appeared before the Commission before?

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<sup>1</sup> Per 20 CSR 4240-10.030(38)

1           A.     Yes. The Commission granted RWC the authority to issue bonds in  
2 Case No. WF-2021-0427.<sup>2</sup> As described in this order, these bonds were approved to fund the  
3 following projects:

- 4           1.     To update the entire water metering system to AMI by replacing all  
5                   manually read meters with radio readers;
- 6           2.     To upgrade meter wells as needed;
- 7           3.     To install new data collectors;
- 8           4.     To update metering software and make live metering information  
9                   available to customers through the company website;
- 10          5.     To purchase new trucks;
- 11          6.     To replace the roof on the main office and install a back-up generator;
- 12          7.     To construct a new garage to house company-owned vehicles; and
- 13          8.     To pay the costs and expenses of the issuance of bonds including the  
14                costs and legal expenses of the finance case.

15          Q.     What is the status of each of these projects?

16          A.     The status of each of the above-mentioned projects are as follows:

- 17          1.     Forty-five percent (as of June 30, 2023) of the manually read meters were  
18                replaced with AMI meters.
- 19          2.     RWC stated in an e-mail they ran out of bond money due to rising cost and  
20                inflation and was not able to complete the upgrade of all the meter wells as  
21                planned. The meter wells are being upgraded in-house as time permits and  
22                will be paid out of the general operating budget.

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<sup>2</sup> See “Order Approving Finance Authority,” item 14 in EFIS

- 1 3. New data collectors were installed with the new AMI meters.
- 2 4. Metering software was upgraded with the new AMI meters.
- 3 5. New company trucks were purchased in February 2023.
- 4 6. The roof on the main office was replaced December 2022. The Company
- 5 provided no documentation for the installation of a back-up generator at the
- 6 main office. The Company stated in an e-mail that the back-up generator at
- 7 the main office was ordered months ago and will be paid out of the general
- 8 operating budget because they ran out of bond money due to rising cost
- 9 and inflation.
- 10 7. The Company did not construct a new garage due to various legal issues and
- 11 the increase in cost of materials.
- 12 8. The costs and expenses of the issuance of bonds including the costs and legal
- 13 expenses of the finance case was paid.

14 Q. What are the advantages of these AMI meters when compared to  
15 conventional meters?

16 A. The advantages these AMI meters offer are as follows:

- 17 1. AMI meters offer automatic hourly readings instead of manual, monthly
- 18 readings offered by conventional meters. This allows the Company and
- 19 customers to be notified a lot sooner if a customer has a potential leak.
- 20 2. AMI meters eliminate the need for personnel to physically visit every meter
- 21 for manual reads every month, freeing up labor for other tasks or reducing
- 22 contractor expenses.

- 1                   3. The automatic readings eliminate inaccurate bills caused by transcription  
2                   errors and erroneous human meter readings. This increases company  
3                   efficiency by reducing billing adjustments and corrections, while also  
4                   increasing customer satisfaction.
- 5                   4. Actual readings are obtained more easily because obstructions from reading,  
6                   such as cars being parked on top of meters or vicious dogs, are no longer  
7                   a factor.
- 8                   5. A safer working environment is produced for the meter readers and field  
9                   technicians because AMI meters reduce the Company's employees'  
10                  exposure to hazardous road conditions, dangerous situations and limits the  
11                  physical contact with customers, which reduces their chances of contracting  
12                  COVID and other sicknesses.
- 13                 6. AMI meters allow the Company to get actual meter reads each month. In  
14                 some instances, RWC is required to estimate bills due to bad weather or  
15                 staffing shortages. During the height of the COVID pandemic, meter readers  
16                 and field technicians were unable to conduct meter readings for long periods  
17                 of time due to COVID infections and quarantine requirements. The reduced  
18                 staff made it very difficult for the Company to send out consistent and  
19                 accurate bills.
- 20                 7. The new AMI meters will have locking lids which will prevent and/or reduce  
21                 people from falling into meter wells, tampering and theft of the meters and  
22                 misplacing of the meter lids.

1                   8. The software that comes with these AMI meters, Aclara, has been reported  
2                   by the Company as user “friendly and adaptable to [their] present system.”<sup>3</sup>  
3                   The Company also states that this software is used by many water utilities  
4                   nationwide, including utilities located in Missouri and regulated by the  
5                   Commission.

6           Q.     Does Staff believe RWC is providing safe and adequate service?

7           A.     Yes. Based on documentation from DNR and what Staff witnessed during the  
8 site inspection on April 26, 2023, Staff believes RWC is providing safe and adequate service.

9           Q.     Does this conclude your rebuttal testimony?

10          A.     Yes it does.

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<sup>3</sup> From the Company’s response to OPC’s DR 2002



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

In the Matter of the Application of a Rate        )  
Increase of Raytown Water Company            )        Case No. WR-2023-0344

**AFFIDAVIT OF DARONN A. WILLIAMS**

STATE OF MISSOURI        )  
  )        ss.  
COUNTY OF COLE        )


**COMES NOW DARONN A. WILLIAMS** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct Testimony of Daronn A. Williams*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
DARONN A. WILLIAMS

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6<sup>th</sup> day of October 2023.

  
\_\_\_\_\_  
Notary Public

DIANNA L. VAUGHT  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: July 18, 2027  
Commission Number: 15207377

## **Daronn A. Williams**

As an Associate Engineer with the Water, Sewer and Steam Department of the Commission Staff, my core duties revolve around being the lead engineer for a variety of cases such as Application for Certificate, Merger, Sale, Transfer, Rate Case, Territorial Agreement, and more filed with the Commission from water and sewer utilities. I also hold a Drinking Water Distribution Level – 1, Drinking Water Treatment Level – D, and Wastewater Treatment Level – D Operations Certification from the Missouri Department of Natural Resources.

### **Educational Background and Work Experience**

I hold a Bachelor of Science Degree in Environmental Engineering from Missouri University of Science & Technology. Prior to starting at the Commission, in December 2018, I worked as an Environmental Engineer at the Missouri Department of Natural Resources for the Air Pollution Control Program, from January 2009 to November 2018.

### **Previous Testimony Before the Public Service Commission**

<b>Case Number</b>	<b>Company</b>	<b>Type of Filing</b>	<b>Issue</b>
SA-2021-0017	Missouri American Water Company (MAWC)	Surrebuttal & Live Testimony	General Info & Misc.
WR-2022-0303	MAWC	Rebuttal	Class Cost of Service/Rate Design
WR-2023-0006	Confluence Rivers	Rebuttal	Maintenance, Service Area Maps and Legal Descriptions