

Exhibit No.: _____
Issue(s): Accounting/Procurement/Employee
Personal Reimbursement Policy and Procedures/
Cross-Subsidization of Non-Regulated Businesses
Witness/Type of Exhibit: Schaben/Direct
Sponsoring Party: Public Counsel
Case No.: WR-2023-0344

DIRECT TESTIMONY
OF
ANGELA SCHABEN

Submitted on Behalf of the Office of the Public Counsel

RAYTOWN WATER COMPANY

CASE NO. WR-2023-0344

October 10, 2023

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DIRECT TESTIMONY
OF
ANGELA SCHABEN
RAYTOWN WATER COMPANY
CASE NO. WR-2023-0344

INTRODUCTION

Q. Please state your name, title, and business address.

A. Angela Schaben, Utility Regulatory Auditor, Office of the Public Counsel (“OPC” or “Public Counsel”), P.O. Box 2230, Jefferson City, Missouri 65102.

Q. What are your qualifications and experience?

A. Please refer to the Schedule ADS-D-1 attached hereto.

Q. Have you testified previously before the Missouri Public Service Commission?

A. I have prepared and submitted pre-filed testimony, but I have not yet been called to testify before the Public Service Commission of the State of Missouri (“Commission”). Please refer to the Schedule ADS-D-2 attached hereto for a list of the cases in which I filed pre-filed testimony.

Q. What is the purpose of your testimony?

A. Almost thirty years ago, Staff conducted a management audit on Raytown Water Company (“Company” or “RWC”, or “Raytown Water”), as ordered by the Commission. Staff and RWC agreed on an implementation plan aimed at rectifying numerous management deficiencies. The purpose of my testimony is to address concerns regarding RWC’s reversion to inefficiencies that originally resulted in the Commission ordered management audit and implementation plan. If left unchecked, such deficiencies could prove detrimental for both the Company and its captive ratepayers.

Q. Please summarize your recommendations as presented in the subsequent testimony.

A. I recommend the Company adhere to its original agreement with Staff and adhere to the policies and procedures lined out in the management audit implementation plan. I recommend the Commission order RWC to deliver progress reports to Staff and OPC on a quarterly basis in an effort to resolve these issues by the Company’s next rate case.

1 **BACKGROUND**

2 **Q. Are there prior Commission Orders requiring a management audit of Raytown Water**
3 **Company (“The Company” or “Raytown Water”)?**

4 A. Yes. Staff conducted a management audit in case number WO-93-194, ordered by the
5 Commission resulting from several concerns raised during a rate case (file number WR-92-
6 85).

7 **Q. Which specific issues led to a management audit ordered by the Commission?**

8 A. The Commission found copious concerns with RWC’s operations, including, but not limited
9 to, the Company’s emergency financial state and its general management practices, during
10 WR-92-85, the Company’s 1992 rate case. As a result, the City of Raytown strongly
11 recommended the Commission order a management audit report completed on the Company
12 before its next rate case.¹

13 **Q. Did Raytown Water complete the requirements directed by Staff in WO-93-194 that**
14 **resolved management concerns discovered in WR-92-85?**

15 A. Yes. After several years of working through the deficiencies raised by Staff, the Company
16 implemented corrective actions (“implementation plan”) leading to resolution. The case was
17 closed in 2000.

18 **Q. During the course of the Company’s audit, was there specific criteria Staff evaluated in**
19 **order to develop its recommendations?**

20 A. Yes. Staff used criteria to evaluate RWC's management processes and practices which were
21 as follows:

22 “grounded on the basic principles of management relating to the primary functions
23 of management that are used to plan, organize, direct, and control its operations. For
24 management to effectively fulfill its responsibilities, management processes and
25 practices must be designed to require and to effectuate an integrated cycle of
26 management actions that function collectively to provide a sound basis for
27 management's execution of its planning, organizing, directing, and controlling

¹ *Initial brief of the City of Raytown*; File no. WR-92-85. See schedule ADS-D3. In its WR-92-85 Report and Order, the Commission specifically referenced, and ordered, the management audit report requested on page 8.

1 functions to accomplish the planned results of the organization in an efficient and
2 economic manner”.²

3 Staff used the following criteria to evaluate the effectiveness of the Company’s management
4 processes and practices:

- 5 • Have objectives and goals been clearly defined with proven relevance to
6 efficient and economic performance?
- 7 • Are goals measurable, reasonably attainable and consistent with established
8 broader objectives, and do they recognize the risks associated with not
9 achieving those objectives?
- 10 • Are adequate controls implemented to provide reasonable assurance that the
11 Company's objectives and goals will be achieved efficiently and
12 economically?
 - 13 ○ Is the system properly designed, such that planned activities can be
14 executed as designed and objectives and goals can be attained?
- 15 • Have controls been implemented which ensure that cost-effective action is
16 taken to minimize deviations from anticipated results?
 - 17 ○ Is the cost-benefit relationship considered by management during the
18 design process?
 - 19 ○ Is the potential loss associated with any risk weighed against the cost
20 to control it?
- 21 • Have controls been implemented which require adequate levels of
22 authorization and approval of activities and transactions?
- 23 • Have controls been implemented to require timely monitoring which
24 encompasses supervision, observation and testing activities, and appropriate
25 reporting to responsible individuals on progress toward planned goals?

² Commission Ordered RWC Management Audit, File No. WO-93-194, page 3; Schedule ADS-D-4.

- 1 • Does adequate documentation exist to show the exercise of authority and
2 responsibility; compliance with policies, procedures, and standards of
3 performance; supervision, observation and testing activities; and verification
4 of planned performance?
5 ○ Does the Company define the basis for approval and authorization of
6 programs, procedures, and operations?
7 ○ Does the Company define the objective(s) for each program,
8 intermediate goals and performance standards, levels of
9 responsibility, and appropriate operational procedures?
10 ○ Does the Company's management information system design result
11 in the provision of timely operational performance data, in an
12 appropriate format with the necessary level of detail for management
13 to take timely corrective action to evaluate and improve scheduling,
14 productivity, and cost progress?
15 • Have the Company's established objectives and goals been achieved?³

16 **Q. Please describe the key findings Staff presented in the management audit.**

17 A. Staff's management audit of Raytown Water Company produced a total of forty eight
18 recommendations relating to strategic planning, financial management, and operations and
19 maintenance with a majority of recommendations perceived as "high" priority.

20 **Q. Of the 48 Staff recommendations resulting from the Management Report, upon which
21 recommendations does your testimony focus?**

22 A. My testimony mainly focuses on the general ledger/automated accounting system,
23 procurement policies and practices, and the reimbursement of personal usage. I also raise
24 matters related to Company recruitment practices and board composition, issues also addressed
25 in Staff's management audit.

³ *Id.*

1 **Q. What was Staff’s recommendation relating to the general ledger?**

2 A. Staff recommended the automation of the Company’s general ledger. The Company created
3 an accounting supervisor position in 1991 in order to assist in an automated general ledger
4 system. However, little progress was accomplished toward automation as of mid-June 1993.
5 The Company was “utilizing a general ledger system that was a combination of manual and
6 automated processes. This resulted in confusion, operating inefficiencies and an overall
7 lack of usefulness to third parties”.⁴ Rather than automated systems, the Chairman of the
8 Board of Directors at that time, “relied upon cumbersome manual systems in order to generate
9 appropriate financial statements”.⁵ According to Staff’s report:

10 The benefits of an automated general ledger include more timely generation of data,
11 greater accuracy of data, and the ability to identify selected data faster for trending
12 analysis. There should also be reduced costs associated with researching and
13 responding to rate case information requests. It should also assist external auditors
14 in compiling information for their year-end review and help to reduce external
15 auditor fees.⁶

16 **Q. Did the Company comply with Staff’s recommendation of automating the accounting
17 general ledger?**

18 A. Yes. The conversion of a manual to automated general ledger system, in addition to the
19 accounts payable and accounts receivable systems, achieved completion by December 1994⁷.
20 As indicated by Staff regarding the automated accounting system implementation:

21 The Company was required to automate the general ledger as part of the stipulation
22 and agreement entered into in Case No. WR-94-211. The Company stated that the
23 automated general ledger system generated financial statements for each month in
24 1994 and produced year-end financial statements in January 1995. The Company’s
25 accounting supervisor is responsible for all entries made to the general ledger.⁸

⁴ Staff MSD Implementation Review of Raytown Water Company, File No. WO-93-194, page 28; Schedule ADS-D-5

⁵ Commission Ordered RWC Management Audit, File No. WO-93-194, page 39; see also Schedule ADS-D-4.

⁶ *Id.*

⁷ Staff MSD Implementation Review of Raytown Water Company, File No. WO-93-194, page 28; See also Schedule ADS-D-5.

⁸ *Id.*

1 **Q. If the Company succeeded in automating its accounting systems as recommended by**
2 **Staff in WR-93-194 and ordered by the Commission in the WR-94-211 Report and**
3 **Order, why are you raising concerns regarding manual accounting records?**

4 A. The Company's external auditors issued a letter on June 1, 2023, accompanying the financial
5 statement audit for the year ended December 31, 2021. Within this document, the external
6 auditors provided several recommendations, to include the following:

7 During our audit, we noted that accounting schedules are prepared manually by
8 accounting staff. We recommend the consideration of transitioning to electronic
9 records to reduce risk of errors.⁹

10 This external audit recommendation seems contrary to Staff's management audit
11 implementation report and the Company's assurance, signed by Neal Clevenger in 1994 that
12 an automated general ledger system conversion is complete and utilized¹⁰, prompting further
13 examination to determine what happened to the automated accounting process between 1994
14 and 2021.

15 **Q. In addition to the external auditor's unexpected recommendation, what other indications**
16 **shows that Raytown Water is not fully relying upon an automated accounting system?**

17 A. The Company's board meeting minutes include several concerning instances where financial
18 reports were completed incorrectly and untimely. The board noted concerns regarding manual
19 accounting records during the June, 9, 2021 board meeting:

20 The board has noted several times incorrect financial statements from Company
21 Accountant. Members also questioned Dave's retirement plan and manual accounting
22 records of Company's books and records.

23 Of further concern is a report from the Senior Company Accountant presented at the April 13,
24 2022 Board of Directors meeting which states that the bank reconciliation had not been

⁹ Letter from The Raytown Water Company external auditors dated June 1, 2023.

¹⁰ Schedule ADS-D-6.

1 completed in the computer system since 2008 and many hours were devoted to researching
2 discrepancies with current numbers.

3 **Q. Does regressing back to manual accounting practices create operations and maintenance**
4 **efficiencies that benefit ratepayers?**

5 A. No. Automated accounting systems reduce redundancy and inefficiencies.

6 **Q. Should an actively involved management have noticed the reversion to manual**
7 **accounting practices?**

8 A. I would think so. An actively involved management should have noticed that bank
9 reconciliations were not completed within the computer system before fourteen years passed.
10 Involved management should also notice that manual accounting processes were still in
11 practice 27 years after the implementation of an accounting system designed for automation.

12 **Q. What do you recommend?**

13 A. I recommend for the Company to begin following Staff's management audit recommendations
14 relating to automated accounting systems once again. Those management audit
15 recommendations should have provided Raytown Water with enough guidance to move
16 forward with operations and maintenance efficiencies that benefit both the Company and
17 ratepayers. Now, decades later, rather than succeeding in additional operations and
18 maintenance efficiencies that improve the bottom line, in many areas the Company seems to
19 revert to its pre-management audit practices.

20 **PROCUREMENT POLICIES AND PRACTICES**

21 **Q. Please state another assurance agreed to by Raytown Water after Staff's management**
22 **audit.**

23 A. Staff raised concerns with the Company's procurement practices.

1 **Q. What were the recommendations by Staff for updating procurement practices?**

2 A. Staff’s management audit recommendation involved developing and implementing “formal
3 competitive bidding procedures for all major equipment purchases and contracting
4 activities.”¹¹

5 **Q. Did the Company comply?**

6 A. According to Staff’s Implementation Report, the Company implemented a competitive bidding
7 policy in June 1995.

8 **Q. What types of purchases did the bidding policy include?**

9 A. The competitive bidding policy should include major equipment purchases, vehicles, and third
10 party contracts. Additionally, the various competitive bids should be presented before the
11 board for discussion and determining a winning bid.

12 **Q. Has the Company shown that it continues to follow a competitive bidding policy?**

13 A. Not that I have seen.

14 **Q. What are recent examples where a competitive bidding policy should have been utilized?**

15 A. The Company recently entered into an AMI contract and also purchased several fleet vehicles.

16 **Q. Has the Company shown that it attempted to competitively bid for these large purchases
17 as directed in the management audit implementation plan?**

18 A. According to Raytown Water’s response to OPC Data Request 7, the Company claims that it
19 has not purchased any major equipment in 10 years. Furthermore, the Company’s response
20 to OPC data request 2001 indicates “RWC has had a long standing relationship with Utility
21 Service Group (USG), our AMI provider. UGS [sic] has the maintenance contracts on all
22 of RWC three towers.” Essentially, “[n]o other solicitation of bids was applied for other
23 than Aclara & USG.”¹² Likewise, the board minutes I reviewed do not show where
24 competitive bids for the new fleet vehicles were solicited.

¹¹ Commission Ordered RWC Management Audit, File No. WO-93-194, page 29; See also Schedule ADS-D-4.

¹² Company response to OPC data request 2001.

1 **Q. Does the acquisition process of the AMI and fleet vehicles follow the procurement policies**
2 **implemented as a result of the management audit?**

3 A. No. RWC decided not to solicit competitive bids and the board meeting minutes did not show
4 where the board was presented with multiple bids for either AMI or fleet vehicles.

5 **Q. What do you recommend?**

6 A. I recommend that RWC follow the assurances it agreed to within the implementation plan of
7 Staff's management audit. Not only does a competitive bidding process promote cost saving
8 measures, it also encourages market competition.

9 **REIMBURSEMENT FOR PERSONAL USAGE OF COMPANY BUSINESS ASSETS**

10 **Q. Did Staff's management audit include a recommendation regarding Raytown Water**
11 **employee personal usage of company equipment?**

12 A. Yes.

13 **Q. What was Staff's recommendation?**

14 A. Staff recommended the Company should "require reimbursement to the Company on a
15 monthly basis for personal usage of Company business office labor and equipment."

16 **Q. For what reason?**

17 A. Staff found that RWC "required semi-annual reimbursement for the personal use of Company
18 labor and equipment at the time of the management audit" and that "employee reimbursement
19 should occur on a monthly basis to reduce the Company's potential for transactions not
20 appearing to be performed on an 'arms-length' basis."¹³ During the management audit, Staff
21 also found that RWC employees were performing the Clevenger family's non-regulated
22 business functions while still compensated by the regulated water company payroll.

¹³ Staff MSD Implementation Review of Raytown Water Company, File No. WO-93-194, page 32; found under Recommendation 20. See also Schedule ADS-D-5.

1 **Q. What steps did the Company take to remedy Staff's concerns regarding the personal use**
2 **of Raytown Water property?**

3 A. In response to Staff's finding, RWC acquired market rate schedules from vehicle rental
4 companies (April 1994), instituted billing procedures and vehicle/equipment logging (May
5 1994), and updated the rental rate reimbursement schedule from six months to one month
6 (October 1998).¹⁴

7 **Q. What additional steps did the Company take to implement Staff's recommendation?**

8 A. The President/General Manager at that time, Mr. Neal Clevenger, had reportedly diminished
9 "his use of Company equipment by increasing his own." Additionally, management held the
10 opinion that although "rental fees should be comparable to those of rental agencies,
11 management feels the Company fees should be somewhat less for employees as a benefit."

12 **Q. Does Mr. Clevenger remain in the role of President?**

13 A. Yes.

14 **Q. Does Mr. Clevenger continue to drive a Company vehicle assigned to him?**

15 A. Yes. He is currently driving a 2023 Dodge 2500 Ram purchased with recent bond proceeds.

16 **Q. Does Mr. Clevenger own a personal vehicle?**

17 A. No. According to the Company's response to OPC Data Request 1, Mr. Clevenger does not
18 own a personal vehicle.

19 **Q. How often does Mr. Clevenger reimburse Raytown Water for his use of a Company**
20 **vehicle?**

21 A. On August 27, 2021, Mr. Clevenger reimbursed Raytown Water \$166.15 for seven months of
22 use from the Clevenger Enterprise Management, LLC account, which is a non-regulated
23 Clevenger family business account.¹⁵

¹⁴ *id*

¹⁵ Copy of RWC July 2021 invoice for personal mileage of Mr. Clevenger's company vehicle paid with check number 3010, which includes reimbursement amounts for January, February, March, April, May, June, and July 2021; See Schedule ADS-D-7.

- 1 **Q. Does Mr. Clevenger reimburse for personal usage of Raytown Water company property**
2 **using a competitive rate comparable to rental companies or dealership leasing?**
- 3 A. No. Mr. Clevenger reimburses Raytown Water based on the IRS standard mileage rates. The
4 IRS standard mileage reimbursement rate for 2023 is 65.5 cents per mile for business use and
5 for 2022, the IRS standard mileage reimbursement was 62.5 cents per mile.
- 6 **Q. Is the IRS standard mileage reimbursement rate a competitive rental price for the**
7 **personal use of a 2023 Dodge 2500 Tradesman truck purchased as part of the Raytown**
8 **Water fleet at the expense of rate payers?**
- 9 A. No.
- 10 **Q. Did Staff and Company agree to the IRS standard mileage reimbursement rate as a**
11 **competitive rental rate for the personal usage of Raytown Water equipment?**
- 12 A. No. The implementation plan states “rental fees should be comparable to those of rental
13 agencies.”¹⁶
- 14 **Q. What are current leasing rate ranges for a 2023 Dodge 2500 regular cab truck?**
- 15 A. Vehicle lease rates can vary, depending on region. According to Edmunds.com, a 2023 Ram
16 2500 Tradesman vehicle could lease for as much as \$1,208, per month.¹⁷
- 17 **Q. What are current rental rate ranges for a 2023 Dodge 2500 regular cab truck?**
- 18 A. Rental truck estimates in the Kansas City area range anywhere from \$29 per day to over \$135
19 per day, depending on vehicle make and model (see Schedule ADS-D-10).
- 20 **Q. What additional company expenses increased due to the new fleet of vehicles purchased?**
- 21 A. The Company’s auto policy premiums and property insurance rates increased by
22 approximately 143.6 percent.¹⁸

¹⁶ Management audit recommendation implementation plan related to reimbursement for the personal use of company property; see Schedule ADS-D-8.

¹⁷ Example of a monthly leasing rate for a 2023 Dodge Ram 2500 in the Kansas City, MO area according to Edmunds.com. Schedule ADS-D-9.

¹⁸ Company response to OPC data request 16.

1 **Q. Does the amount that Mr. Clevenger reimburses Raytown Water for the off-hours use of**
2 **a recently purchased company vehicle factor in the Company's increased property tax**
3 **rates and auto policy premiums related to the vehicle's purchase?**

4 A. No. Mr. Clevenger is using a non-regulated family business account to reimburse RWC for
5 IRS standard business mileage only.

6 **Q. What other concerns are raised by Mr. Clevenger using the IRS standard mileage**
7 **reimbursement rate rather than the competitive rental rate agreed upon in Staff's**
8 **Management Audit?**

9 A. The IRS standard mileage reimbursement rate is generally utilized to reimburse employees for
10 business use of their personal vehicles. Mr. Clevenger does not own a personal vehicle. His
11 exclusive use of a Raytown Water Company vehicle, the usage of which is paid from a non-
12 regulated family business account, is essentially subsidizing the family's non-regulated
13 business enterprise at the expense of captive ratepayers.

14 **Q. Why is Mr. Clevenger's exclusive use of a Raytown Water Company vehicle, when the**
15 **usage is paid from a non-regulated family account, an example of cross-subsidization?**

16 A. Discovery in this case shows that Mr. Clevenger does not reimburse Raytown Water for the
17 after-hours use of the company vehicle on a monthly basis. The attached check image shows
18 that he pays for several months at once¹⁹. Additionally, the rate at which Mr. Clevenger
19 reimburses is not a competitive rate that a rental or leasing entity would charge for a vehicle
20 rental. Mr. Clevenger himself was personally responsible for Staff's management audit
21 implementation regarding the reimbursement of personal usage of company equipment. The
22 implementation plan sets monthly reimbursement as proper in order to diminish cross-
23 subsidization between regulated and non-regulated family businesses and states that rental fees
24 should be comparable to rental agencies.²⁰ Clearly, these policies are not followed, which
25 leaves Raytown Water's captive ratepayers subsidizing non-regulated family businesses.

¹⁹ Schedule ADS-D-7.

²⁰ Copy of the policy implementation signed by Neal Clevenger; referenced in Schedule ADS-D-8.

1 **Q. What benefit arises from Mr. Clevenger in utilizing a Raytown Water vehicle for after-**
2 **hours use rather than a vehicle from a non-regulated family business?**

3 A. Raytown Water is regulated, which means the Company can recover the costs and expenses of
4 Company property in addition to a return on investment, at the expense of captive ratepayers.
5 Purchasing and operating a company vehicle for a non-regulated business is less appealing
6 since non-regulated businesses must operate competitively in order to retain customers.
7 There's no guarantee vehicle expenses could be recovered from a non-regulated entity, and no
8 return on investment.

9 **Q. What is your recommendation?**

10 A. RWC and its president should be ordered to follow assurances agreed to within the
11 implementation plan of Staff's management audit, which includes competitive reimbursement,
12 based on rental rates, for the personal use of company property. Mr. Clevenger does not own
13 a personal vehicle and the company truck he drives remains idle at an unregulated family
14 business when he is on vacation.²¹ Mr. Clevenger should be required to reimburse RWC a
15 competitive amount for his exclusive use of a Company vehicle, which would increase revenue
16 and diminish the cross-subsidization of non-regulated family business ventures. Additionally,
17 since Mr. Clevenger and RWC have deviated from the agreement between company and Staff,
18 I recommend a disallowance of \$8,030 in rate base to account for the rate of return and
19 depreciation rate of Mr. Clevenger's company vehicle.

20 **ADDITIONAL AREAS OF CONCERN**

21 **Q. In addition to the concerns above, are there additional audit management report findings**
22 **and implementation deficits?**

23 A. Yes. Staff raised an issue with the Company's recruiting and hiring procedures in the
24 management audit and recommended the Company to "[d]evelop and implement recruiting
25 and hiring procedures which are designed to select applicants having the highest level of

²¹ Copy of vehicle log showing where Mr. Clevenger's company vehicle remained idle at an unregulated family business while he was on vacation. Schedule ADS-D-11.

1 knowledge, skill, and experience necessary to improve the operational performance of the
2 Company.” These concerns were raised in response to inconsistent hiring practices which led
3 to the employment of unexperienced family members over potentially more qualified
4 applicants.

5 **Q. What actions did Raytown Water take to remedy Staff’s concerns?**

6 A. The Company formalized a hiring process, proceeded to advertise job vacancies in Raytown
7 newspapers, and began utilizing a written job application.

8 **Q. Does the Company still follow the policies laid out in the implementation plan?**

9 A. In response to OPC data request number 6, the Company reportedly recruits through
10 Indeed.com, help wanted signs, and word of mouth. Admittedly, advertising employment
11 opportunities online leads to a greater audience reach than the local newspaper. Present day
12 open employment opportunities are far easier to communicate with potential applicants using
13 even a small percentage of the various employment search engines, or even through local
14 college recruitment. There are 28 colleges with Associate, Bachelor, Masters, and Doctoral
15 degrees in and around Raytown, Missouri. The “efforts” Raytown describes fails to take
16 advantage of any real recruitment opportunities in and around their community, and shows
17 why Raytown is almost entirely Clevenger/Thompson.

18 **Q. Staff’s management audit also pointed out that the RWC Board consisted of many family
19 members. Has the Company remedied this?**

20 A. Currently, the RWC board consists of seven members. The family does not hold a majority of
21 RWC board positions, though the family does vote board members in. Potentially of more
22 concern is the fact that the Audit Committee consists solely of Clevengers and only Clevengers
23 appear to attend the Audit Committee meetings. The two board members that head the audit
24 committee are Lee Clevenger and Neal Clevenger. Generally, audit committees operate as an
25 independent subcommittee from the board of directors. Yet, RWC’s audit committee cannot
26 be viewed as independent with its composition of two familial board members, and the
27 meetings consist of only family members. An audit committee provides boards quarterly to
28 annual reports on an organization’s financial internal controls, audit processes, and financial

1 reporting. Essentially, the Clevenger family is reporting to itself, with very little outside
2 involvement.

3 **Q. Do you have additional issues to point out?**

4 A. Yes. Raytown Water's Vice President is currently an hourly employee that accumulates nearly
5 one-third of her salary in overtime hours. It's exceedingly rare for Vice Presidents to work for
6 an hourly wage, rather than a salary. I would recommend that Raytown Water's Vice President
7 be a salaried position, more in line with similar positions within other water utilities.

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

9 A. Yes.

**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 ANGELA SCHABEN

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

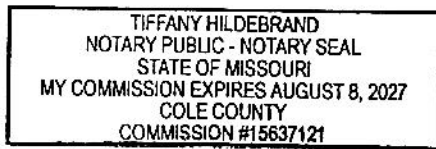
Angela Schaben, of lawful age and being first duly sworn, deposes and states:

1. My name is Angela Schaben. I am a Utility Regulatory Auditor for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

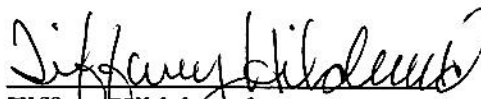


Angela Schaben
Utility Regulatory Auditor

Subscribed and sworn to me this 5th day of October 2023.



My Commission expires August 8, 2027.



Tiffany Hildebrand
Notary Public