

OFFICE OF THE PUBLIC COUNSEL'S DATA REQUEST NO. 1200-1212

The Office of Public Counsel (Public Counsel), in accordance with its authority to “represent and protect the interests of the public in any proceeding” before the Commission (§ 386.710(2) RSMo) submits the following Data Requests to Raytown Water Company (“Raytown,” “RWC,” or “Company”) pursuant to Commission Rule 20 CSR 4240-2.090. Please provide electronic responses within ten (10) days to opcservice@opc.mo.gov, Manzell.payne@opc.mo.gov, and anna.martin@opc.mo.gov or provide the information you have at that time. These data requests are continuing in nature and require supplemental responses as each recipient obtains further or different responsive information.

Responses by Neal Clevenger

DATA REQUESTS

1200. Does Raytown use any formal guides, policies, processes, procedures or documentation to determine the wages/salaries for Raytown employees? If yes, list and describe each policy, procedure and/or document and provide a complete copy of said documentation. If no, please explain in detail how wages/salaries are determined for Raytown Employees.

See the response to OPC DR 1201

1201. Is a base pay increase considered each year for all Raytown employees? If yes, at what point during the year and/or what triggering event(s) is a wage increase considered?

The Company grants increases consistent with the COLA amount issued in October by Social Security each year for base pay increase for all Raytown employees. This has been the Company's practice for approximately 35 years. The increase is effective January 1 of the following year. The employee may also receive a base increase should they receive DS Certification, obtain a CDL, be promoted or their job description changes. The next Merit increase will be in conjunction with our next rate case filing.

1202. Does Raytown use any other formal guides, policies, processes, procedures or documentation other than the cost-of-living adjustment (COLA) in order to determine the increase in wages for Raytown's employees? If yes, list and describe each additional policy, procedure and/or document and provide a complete copy of said documentation. If no, please explain in detail what policies, processes, and procedures are entailed in determining any subsequent increases they may receive.

NO. Company does not have a formal policy in place for base wage increase aside from the use of the COLA for wage adjustments. As a test of the reasonableness of these amounts, the Company reviews MERIC data and, reviews and compares wages as advertised in INDEED for like positions

in the area to ensure that the wages are competitive in the market for quality employees, both current and new hires. Years of experience, duties and certification(s) are also taken into consideration when reviewing wages.

1203. Ms. 'Chiki Thompson' has accumulated considerable overtime during the test year. Please provide a narrative of Ms. Thompson's changing job responsibilities/titles since the last rate case.

Chiki Thompson job responsibilities have not changed. Due to increase in work and lack of employees to complete necessary tasks, Ms. Thompson has had to do more work in the field reading meters, after hour service restoration, work on water main breaks and help cover other positions for those who are out ill, Covid quarantined or on vacation in addition to regular daily duties.

Water main breaks often do not occur during regular business hours and Mo Department of Natural Resources (MODNR) requires someone with a DS certification to be involved with the repairs of such water breaks.

1204. The following Employees were promoted since the prior rate case:

- a. Leslie Smart
- b. Erica Baier
- c. Toni Stubblefield
- d. Brayton Pescetto
- e. Truman Thompson

Please provide a detailed narrative of the above mentioned employees' change in job responsibilities/titles since the last rate case.

- a. Leslie Smart – Jr. accounting clerk to Sr. accounting clerk**
- b. Erica Baier – customer service technician to administrating assistant/Sr. customer service technician**
- c. Toni Stubblefield -customer service technician to Jr. accounting clerk**
- d. Brayton Pescetto -field service technician/operator to crew chief/operator**
- e. Truman Thompson -field service technician to crew chief**

Please see current job descriptions for each employee as attached.

1205. Given her extensive duties and her authority within the organizational chart, why has Ms. Thompson not been promoted to a salary rather than an hourly pay scale?

Pay increase was set in last rate case by MPSC and approved by OPC.

1206. Please provide a detailed explanation for why the following employees' have not been promoted to a salary rather than an hourly pay scale.

- a. Leslie Smart
- b. Erica Baier
- c. Toni Stubblefield

This pay scale and type is consistent with what was reviewed in the Company's last rate case. It is the company's belief that employees should be compensated for the any overtime hours required to get time sensitive tasks completed as the Company is shorthanded in both the field and office.

1207. With the installation of the AMI meters the expectation is that the physical meter reading will be eliminated.

How many employees will be affected? **One, See the below.**

Please list the employees and their hourly pay rate. What new job duties will they be assigned?

Chandis Raygor \$18.00 /hr

Mr. Raygor is a new hire and has been training in both meter reading & field construction. He will be moved to Field Tech. Please see job description for Field Tech and Meter Reader.

Fran Sherman – Assistant Service Tech \$22.45/hr will have no change in duties.

Complete re-reads, move-in/out work orders, investigation work orders, water sampling, collection disconnect/reconnect.

Tommy Thompson –Assistant Service Tech \$ 19.83 will help more with Field than Service as needed by day.

Complete re-reads, move-in/out work orders, investigation work orders, collection disconnect/reconnect, flush hydrants, traffic control, water main replacement, repair emergency leaks/water breaks.

Will there be a change in their hourly pay rate?

NO, not at this time.

1208. Please provide a copy of the monthly water billing to all non-regulated affiliates to Raytown Water Company from June 2021 to current month. Actual copies of each billing if possible. If not, the invoice should provide monthly usage, breakdown of charges, surcharges, taxes and whether the bill is an estimate or an actual reading.

Please see attached monthly water bills for RWC's non-regulated affiliate from June 2021 to current.

1209. Referencing the Payroll and Payroll Taxes Day 120 spreadsheet provided by staff, what would be the expected reduction in overtime hours with the number of new hires?

If there are no expected reductions in overtime, please provide an explanation as to why.

There would be no expected reductions in overtime. None of the new hires are assigned to the office work, so all overtime would remain basically the same. In the field, the over time is mainly for water main breaks after hours and on weekends. There would be no reduction in overtime in fact it is on the increase as water main breaks appear to be on the rise.

1210. Has the Company changed liability insurance carriers since 2018? If yes, please list the dates of coverage for each separate carrier.

Yes.

- **Billups, Synder Associates 4/30/18-4/30/19**
- **Creative Planning 4/30/19-4/30/20**
- **Cincinnati Insurance 4/30/20-current**

a. Please provide a detailed list of the claims deductible amount for each policy.

Please see spread sheet 1210-1211

1211. What has the annualized liability insurance premiums for each policy purchased between 2018 through 2023?

Please see spread sheet 1210-1211

1212. How many successful liability judgments have been rendered against the Company since 2018? Please list the date of the final judgement and the amount of the judgement. Please list the amount of each of the judgements that were the responsibility of the Company to pay. What account were the payments recorded?

M.Dupree vs RWC	9/7/23	\$40,000	paid by insurance
S.Smith vs RWC	12/9/22	\$1,000,000	paid by insurance
E.Cox vs RWC	12/17/20	\$58,000	paid by company; recorded on acct# 01.8100.925-1