

Data Response Display - WR-2023-0344 - 0128.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0128.0
Requested Date	10/5/2023
Due Date	10/15/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	Water and Sewer Report
Description	Please provide a narrative reconciliation of why the Water and Sewer Report discusses neither water loss nor the 14 separate months that Raytown sold more water than it purchased since the 2020 case. Specifically, please explain why Staff only discussed these issues in the purchased water section of the Auditing Department Report.
Request Security	Public (DR)

Response Date 10/16/2023

Response Because the faulty meters owned by Kansas City were replaced, there was no reason to attempt to perform additional analysis. Non-revenue water cannot be reliably determined with the small sample size of recent, higher quality data. Staff prepares a recommendation for the Commission, and is under no requirement to include special analysis for the Office of Public Counsel in its recommendations.

Objections

Response Security Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0138.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0138.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	In reference to Staff's response to OPC Data Request number 0128.0
Description	In reference to Staff's response to OPC Data Request number 0128.0, please confirm that the Staff's water and sewer department did not identify, review, or address any engineering concerns related to water loss or leaks as part of the Water and Sewer Report attached to the non-unanimous stipulation and agreement reached between Raytown and Public Service Commission Staff. If this is not accurate, please identify where in the Water and Sewer Report Staff's water and sewer department identifies, reviews, or addresses any engineering concerns related to water loss or leaks.
Request Security	Public (DR)

Response Date	10/23/2023
Response	Staff did not address any engineering concerns with water loss.
Objections	
Response Security	Public (DR)
Rationale	

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0140.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0140.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	water loss and leak data
Description	Does Staff believe that water loss and leak data is not an engineering concern for operation of water company?
Request Security	Public (DR)

Response Date 10/23/2023

Response Staff understands that water loss is a fraction of non-revenue water, and non-revenue water is an engineering, maintenance, and administrative concern for a water company.

Objections

Response Security Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0142.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0142.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	meters
Description	Please provide the approximate date Staff became aware that the meters that recorded the volume of water sold to Raytown from the city of Kansas City were replaced. Also, please provide a list of the actions the Company took after discovering the discrepancy.
Request Security	Public (DR)
Response Date	10/23/2023
Response	The company contacted Kansas City to initiate an investigation. Staff is not aware of the date.
Objections	
Response Security	Public (DR)
Rationale	

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0143.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0143.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	data for water loss
Description	According to Staff, what is the first month of reliable data for water loss? Does Staff believe that any of the months prior to the meters from Kansas City being changed are reliable? Why or why not?
Request Security	Public (DR)

Response Date 10/23/2023

Response Staff has not identified a new date for a future analysis of water loss.

Objections

Response Security Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0144.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0144.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	Staff's response to OPC Data Request number 0128.0
Description	In reference to Staff's response to OPC Data Request number 0128.0, please provide a narrative response indicating what "additional analysis" Staff would have performed if the faulty meters owned by Kansas City had not been replaced.
Request Security	Public (DR)

Response Date 10/23/2023

Response In a typical rate case Staff examines non-revenue water, attempts to determine the fractions of water loss, water theft, poor metering, adjustments, etc., and determines if additional intervention is necessary by a company.

Objections

Response Security Public (DR)

Rationale

Attachments ▼

No Attachments Found

Data Response Display - WR-2023-0344 - 0145.0

Request Summary ▾

Submission No.	WR-2023-0344
Request No.	0145.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	Staff's response to OPC Data Request number 0128.0
Description	In reference to Staff's response to OPC Data Request number 0128.0, please confirm that the "small sample size of recent, higher quality of data" would only exist outside of the test year and update period of June of 2023. If not please explain why this assumption is false given Raytown's direct testimony of Mr. Neal S. Clevenger that meters were replaced in June and July of 2023 by the City of Kansas City.
Request Security	Public (DR)

Response Date 10/23/2023

Response The test year ended June 30, 2023, therefore the data problems associated with the meters owned by Kansas City would not have been resolved within the test year.

Objections

Response Security Public (DR)

Rationale

Attachments ▾

No Attachments Found

Data Response Display - WR-2023-0344 - 0146.0

Request Summary ▾

Submission No.	WR-2023-0344
Request No.	0146.0
Requested Date	10/18/2023
Due Date	10/23/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	Staff answer to data request number 0128
Description	Please refer to Staff answer to data request number 0128, which indicates that Staff believed there was no reason to attempt to perform additional water loss analysis. Please provide a narrative description of what analysis was performed as part of this case related to water loss as my understanding is that Staff used an adjusted water loss number from the 2020 rate case.
Request Security	Public (DR)

Response Date 10/23/2023
Response See DR 0127 Response.
Objections
Response Security Public (DR)
Rationale

Attachments ▾

No Attachments Found

Data Response Display - WR-2023-0344 - 0127.0

Request Summary ▼

Submission No.	WR-2023-0344
Request No.	0127.0
Requested Date	10/5/2023
Due Date	10/15/2023
Issue	Other Other
Requested From	MO PSC Staff (Other) Casi Aslin casi.aslin@psc.mo.gov
Requested By	Office of the Public Counsel (OPC) (Other) John Robinett john.robinett@opc.mo.gov
Brief Description	Staff Workpapers
Description	Please provide any and all work papers that support Staff's recommendation of 12.04% for water loss in this case.
Request Security	Public (DR)

Response Date 10/12/2023

Response Please see the attached workpaper from the WR-2020-0264 rate case for the 12.04% water loss calculation. This was used to calculate the purchased water expense adjustment for the EMS run attached to the Unanimous Disposition Agreement approved by the Commission on August 26, 2020.

Objections

Response Security Public (DR)

Rationale

Attachments ▼

Name	Size	Security
Purchased Water Expense - Settlement.xlsx	90.35 KB	Public (DR)
Total: 1 file(s), 90.35 KB		

Raytown Water Company
 WR-2020-02164
 Test Year 12/31/2019
 Purchased Water
 Source: DR 7, 10, 11, 12, GL
 Prepared by: Antonija Nieto

Annualized Revenue Usage from Revenue Workpapers (3 year average)	358,303,540	gallons
Gallons per hundred cubic feet (ccf)	748	gallons
Annualized Usage in CCF	479,015.43	ccf
Annualized Loss Factor (3 year average)	12.04%	
Total Annualized CCF Purchased	536,688.89	ccf
FY2019 rate per ccf	\$2,510	
Annualized Cost	\$1,347,089	
May 1, 2020 1.7% rate increase	\$0	
Total Annualized CCF Purchased	\$1,347,089	
Test Year Cost (Account 602)	\$1,513,915	
Staff Adjustment to Account 602,000:	-\$168,826	
(To adjust test year purchased water to an annualized amount)		

ICCF (100 cubic feet) = 748 gallons

Note: Calculated from DR 7 "2019 Wholesale Water Bills vs. RWC Sales" - De

Note: Per update to DR 10, there will be a rate increase freeze in 2020 due to

	Gallons purchased	Gallons sold	Loss Factor	% Loss
2014	393,417,867	378,281,800	15,136,067	3.85%
2015	428,441,684	373,381,300	55,060,384	12.85%
2016	429,493,372	383,107,700	46,385,672	10.80%
2017	394,310,444	378,916,600	15,393,844	3.90%
2018	416,093,711	364,247,900	51,845,811	12.46%
2019	467,929,706	346,845,488	121,084,218	25.88%
3 Yr avg	426,111,287	363,336,663	62,774,624	12.04%

Adjusted -28,125,000 for hydrant leak

Highlighted years excluded from the average as outliers.

Purchase Water - Source of Sup	Per-Exp=	Rev/Amend=	Transfers=	Encumb=
1/31/2019 01/2019	01,7100,602			
2/28/2019 02/2019	RECORD WATER PURCHASED	DR		
3/31/2019 03/2019	Record Water Purchased	DR		
4/30/2019 04/2019	RECORD WATER PURCHASED	DR		
5/31/2019 05/2019	Record Water Purchased	DR		
6/30/2019 06/2019	RECORD WATER PURCHASED	DR		
7/30/2019 07/2019	Record Water Purchased	DR		
8/31/2019 08/2019	RECORD WATER PURCHASED	DR		
9/30/2019 09/2019	Record Water Purchased	DR		
10/31/2019 10/2019	RECORD WATER PURCHASED	DR		
11/30/2019 11/2019	Record Water Purchased	DR		
12/31/2019 12/2019	RECORD WATER PURCHASED	DR		
Totals:	Orig=App=.00	Rev/Amend=.00	Transfers=.00	Encumb=.00

member total \$ over CCF usage

o Covid-19.