

Responses by: Neal Clevenger

PUBLIC COUNSEL DATA REQUEST NOS. 8510 – 8527

DATA REQUESTS

8510. In reference to the direct testimony of Mr. Neal S. Clevenger, page 6 line 15 through page 7 line 2, please provide the water volumes the City of Kansas City billed RWC for in August 2023 and September 2023.

Please see attached, 2023 Water Loss (Wholesale Water Purchase VS. RWC Sales).

8511. In reference to the direct testimony of Mr. Neal S. Clevenger, page 6 line 15 through page 7 line 2, please provide the water volumes Raytown sold to its customers for August 2023 and September 2023.

Please see attached, 2023 Water Loss (Wholesale Water Purchase VS. RWC Sales).

8512. Does Raytown Water track the work being performed on its distribution system? If so, please specify how.

Yes, a work order is completed for each.

8513. Does the Company generate a work order or similar document for each repair or replacement job?

Yes.

8514. Does the Company keep a separate repair record of the work performed per year besides the general ledger?

Yes.

8515. Assuming that Raytown Water does keep a repair record of the work performed in a year, outside of the information contained in the general ledger, please indicate how Raytown verifies the following information:

a. When the work is performed; **Each work order contains the date of work.**

b. Where the work is performed; and

Each work order contains the address of where the work is performed.

c. The cost of each repair itemized as materials supplies, labor, and any other expenses.

The completed work orders are itemized for each.

8516. Assuming that Raytown Water does keep a repair record of the work performed in a year, outside of the information contained in the general ledger, please provide copy of all such repair records for the last three years.

Please find attached work orders for 2020-2023.

8517. In reference to Raytown's response to Staff data request number 0022, the capitalization and maintenance expense ratio, please verify that the identified values for the expense incurred in 2020 and 2021 are meant to be identical.

- a. If so, please explain what caused the costs to be identical;
- b. If not, please provide an update to correct this information.

This was an error. Please see corrected 2020-2022 O&M spreadsheet.

8518. Please provide copies of any and all invoices and other documentation that support the values in Raytown's response to Staff data request 0022.

Please see attachment, 8518 Plant.

8519. Based on Raytown's response to Staff data request 0022, the value for O&M expense related to distribution mains has more than doubled from 2021 to 2022. Please provide a detailed description of why Raytown has experienced this dramatic increase. In addition, please provide any and all supportive documentation related to this issue.

The majority of the increase was due to the dramatic increase in water leaks, averaging one a day. Please see 8516 & 8526 for the repair records. The company made an all-out effort to keep up with them day and night.

8520. Based on Raytown's response to Staff data request 0022, the value for O&M expense related to distribution mains has more than doubled from 2021 to 2022. Please provide any documents that demonstrate any monetary increase related to materials and supplies for distribution main work or indicate where those documents have been previously provided.

Please see 8516.

8521. Based on Raytown's response to Staff data request 0022, the value for O&M expense related to distribution mains has more than doubled from 2021 to 2022. Please provide any documents that demonstrate any monetary increase related to labor for distribution main work or indicate where those documents have been previously provided.

Please see 8516.

8522. Based on Raytown's response to Staff data request 0022, the value for O&M expense related to distribution mains has more than doubled from 2021 to 2022. Please provide any documents that demonstrate any monetary increase related to engineering and design work

for distribution main work or indicate where those documents have been previously provided.

Please see 8516.

8523. Based on Raytown's response to Staff data request 0022, the value for O&M expense related to distribution mains has more than doubled from 2021 to 2022. Please provide any documents that demonstrate any monetary increase related to overheads charged for distribution main work or indicate where those documents have been previously provided.

Please see 8516.

8524. What amount of overhead, if any, has been booked as expense and included in the amounts shown in the response to Staff data request number 0022?

Please see 8516.

8525. What amount of overhead, if any, has been booked as capital and included in the amounts shown in the response to Staff data request number 0022?

Please see 8516.

8526. Please provide the same information Staff requested for data request 0022, but for calendar years 2018 and 2019. Further, please ensure you provide sufficient detail to allow a comparison of this data and the information provided in response to OPC data request 8500 regarding the number of leaks per year and the associated O&M expense.

Please see attachments, 2018 & 2019 work orders, O&M expense for 2018-2019 and 8526 Plant.

8527. Please provide the date RWC linked the annual leak reports for 2021 and 2022 to the Company's website, and provide the date the Company expects to provide the 2023 annual leak report on its website.

2021 and 2022 Annual Leak Loss reports added to website on 10/13/23.

2023 Annual Leak Loss report received and added on website 10/25/23.

DR #0022 O&M EXPENSE/CAPITALIZATION

	TOWER & STORAGE	DISTRIBUTION MAINS	SERVICE LINES	METERS		HYDRANTS
				PLASTIC / HOT RODS	METER WELLS	
Expense	661 / 672	673 / 673-3	675 / 675/1	676 / 676-1	675 / 675-1	677 / 677-1
Plant	342 / 342-1	343 / 343-1	345 / 345-1	346 / 10/20	347 / 347-1	348 / 348-1
2020						
O&M	\$16,221.90	\$217,196.06	\$16,511.09	\$5,785.85	\$11,208.83	\$2,622.74
Capitalized	\$0.00	\$61,243.10	\$33,112.27	\$11,596.89	\$0.00	\$21,599.52
2021						
O&M	\$25,421.51	\$344,678.23	\$30,979.39	\$4,230.89	\$5,806.28	\$2,845.80
Capitalized	\$0.00	\$613,686.80	\$3,649.37	\$27,658.77	\$0.00	\$56,593.80
2022						
O&M	\$21,032.87	\$474,606.43	\$44,983.83	\$4,878.59	\$4,612.33	\$6,120.17
Capitalized		\$948,536.32	\$6,856.10	\$28,149.17	\$3,349.42	\$157,475.57