

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

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

**LIST OF ISSUES, LIST AND ORDER OF WITNESSES, ORDER OF
OPENING, AND ORDER OF CROSS-EXAMINATION**

COMES NOW the Office of the Public Counsel, through counsel, and on behalf of itself, the Staff of the Missouri Public Service Commission, and The Raytown Water Company and for its *List of Issues, List and Order of Witnesses, Order of Opening, and Order of Cross-Examination* states as follows:

The parties are:

OPC: The Office of the Public Counsel
Staff: Public Service Commission Staff
RWC or Company: Raytown Water Company

LIST OF ISSUES¹

- 1. Advanced Metering Infrastructure (“AMI”)**
 - a.** How should this AMI investment be treated for rate making purposes?
 - b.** Should the Commission grant a return on the AMI investment?
 - c.** Should the Commission include all known and measurable AMI investments that the Company has either in service or in inventory in rate base?

2. **Late Fees:** Should the Commission eliminate or reduce late fees?
3. **Depreciation**
 - a. **Reserve Transfer**
 - 1 Should depreciation reserves be transferred from over-accrued accounts to not-fully-accrued accounts?
 - 2 If so, to which accounts should the depreciation reserves be transferred?
 - b. Should depreciation expense be removed for the existing plastic meters?
 - c. Should depreciation reserve be adjusted to reflect the salvage values from the Company's vehicle sales in 2022 and 2023?
4. **Customer Notice:** In what instance should the Company send additional notice of a proposed rate increase that differs from the original, noticed rate increase?
5. **Distribution Mains Operations and Maintenance ("O&M"):**
 - a. What value of non-labor operations and maintenance expense should be included for distribution mains?
6. **Rate of Return:**
 - a. What is the appropriate return on common equity?
 - b. If the Commission agrees to change the return on common equity, should the dividend rate on preferred stock change for the purposes of rate of return?

¹ Please note: Opinions differ among the parties regarding the proper characterization for one or more issues.

7. **Cash Working Capital (“CWC”):** Should cash working capital be included in rate base?
8. **Payroll Expense**
 - a. Should all of the Company’s employee overtime be normalized?
 - b. What is the just and reasonable amount of pay to include in rates for the Company’s Vice President, Sr. Accounting Clerk, Jr. Accounting Clerk, and Sr. Customer Service/Admin Assistant?
9. **Meter Reading Expense:** What is the just and reasonable amount to include in rates for meter reading expense?
10. **Rate Case Expense**
 - a. What amount of rate case expense should be included in the cost of service?
 - b. Should rate case expense be amortized or normalized?
 - c. Should the rate case expense follow a 50/50 sharing mechanism?
11. **Truck Disallowance**
 - a. What amount of the Company’s Truck 206 should be included in revenue requirement?
 - b. How should the Company be reimbursed for the personal use of its vehicles?
12. **1993 Management Audit**
 - a. Should the Company be required to follow any recommendations spelled out and agreed upon in the 1993 management audit?

- b. If so, which of the 1993 audit recommendations should the Company be required to follow?
- c. If so, what benchmarking policy should the Company follow to ensure it is following these recommendations?

ORDER OF OPENING STATEMENTS

Opening Statements

- RWC
- Staff
- OPC

ORDER OF WITNESSES²

RWC witnesses

Chiki Thompson

Andre Noel³

Neal Clevenger

Staff witnesses

Keith Foster

Daronn Williams

David Spratt⁴

Angela Niemeier

Melanie Clark

Randall Jennings

Courtney Horton

² The parties will specify the topic or topics each of their witnesses will discuss in the Position Statement filing.

³ Because of availability issues, Andre Noel will appear via WebEx on Thursday, November 16, 2023, beginning at 1:00 pm.

⁴ Because of availability issues, David Spratt's testimony must occur on Thursday, November 16.

Sherrye Lesmes

Lisa Stockman

OPC witnesses

Geoff Marke

John Robinett

David Murray

John Riley

Manzell Payne

Angela Schaben

ORDER OF CROSS-EXAMINATION

Staff witnesses

RWC

OPC

RWC witnesses

Staff

OPC

OPC witnesses

Staff

RWC

WHEREFORE, the OPC submits this *List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements*, on behalf of itself and the parties referenced herein.

Respectfully submitted,

/s/ Anna Martin
Anna Martin (Mo Bar #72010)
Missouri Office of Public Counsel
P. O. Box 2230
Jefferson City MO 65102
(573) 751-5318
(573) 751-5562 FAX
Anna.Martin@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 9th day of November, 2023.

/s/ Anna Martin