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December 7, 2023
Data Center
Missouri Public
Service Commission

Exhibit No. 117

Staff – Exhibit 117
Williams
Surrebuttal
File No. WR-2023-0344

Exhibit No.:
Issue(s): AMI meters
Witness: Daronn A. Williams
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: WR-2023-0344
Date Testimony Prepared: November 8, 2023

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER & STEAM DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DARONN A. WILLIAMS

THE RAYTOWN WATER COMPANY

CASE NO. WR-2023-0344

Jefferson City, Missouri
October 2023

1 **SURREBUTTAL TESTIMONY OF**
2 **DARONN A. WILLIAMS**
3 **THE RAYTOWN WATER COMPANY**
4 **CASE NO. WR-2023-0344**

5 Q. Please state your name and business address.

6 A. My name is Daronn A. Williams. My business address is 200 Madison Street,
7 Jefferson City, MO 65101.

8 Q. By whom are you employed and in what capacity?

9 A. I am employed by the Missouri Public Service Commission (“Commission”) as
10 an Associate Engineer with the Water, Sewer, & Steam Department.

11 Q. Are you the same Daronn A. Williams who filed direct testimony in this case on
12 October 10, 2023?

13 A. Yes, I am.

14 Q. What is the purpose of your surrebuttal testimony in this case?

15 A. The purpose of my surrebuttal testimony is to rebut certain statements made by
16 Office of the Public Counsel (“OPC”) witness Dr. Geoff Marke in his rebuttal testimony.

17 Q. What is it that Dr. Marke testifies to that you disagree with?

18 A. Beginning on page four, line 22, Dr. Marke attempts to summarize the eight
19 benefits of Advanced Metering Infrastructure (“AMI”) meters listed in my direct testimony.

20 Q. Why does Staff disagree with these statements?

21 A. Staff disagrees with these statements because Dr. Marke poorly summarized the
22 points detailing the advantages of AMI meters. Frankly, the regurgitated points are cherry-
23 picked and do not provide the whole picture of why AMI meters are beneficial.

1 Q. What are the important points that Dr. Marke missed when he tried to summarize
2 your direct testimony?

3 A. The following is a summary of advantages of AMI meters that I detail in my
4 direct testimony. The information in boldface type are points Dr. Marke omitted.

- 5 1. Hourly readings as opposed to monthly reading, **which allows the Company**
6 **and customer to recognize a leak sooner rather than later.**
- 7 2. Meter readers do not need to go on residents' premise to read meters, **which**
8 **frees up labor for other tasks, or could lower labor costs.**
- 9 3. Automatic meter readings eliminate transcription errors.
- 10 4. Meter readers avoid "vicious dogs" **and all other obstructions like cars being**
11 **parked on top of meters, which prevents manual meters from being read.**
- 12 5. Meter readers are safer **because with AMI meters, they can avoid hazardous**
13 **road and walkway conditions (snow, ice, heavy rain, etc.). This will reduce**
14 **automobile accidents and slips and falls while on the job. In addition, the**
15 **meter readers will have less contact with the general public, which reduces**
16 **their chance for contracting COVID and other illnesses.**
- 17 6. **Less estimated bills and more accurate bills with AMI meters.**
- 18 7. Locks on AMI meters should reduce people from accidently falling into the
19 meter pits, **and people from tampering and stealing meters. Per Company's**
20 **response to OPC's Data Request ("DR") 2032, approximately eight meters**
21 **have been stolen in the past five years. In addition, the Company explained**
22 **in its response that "squatters will steal a meter from [one] location...and**
23 **put it in the well and have water until caught."**

Surrebuttal Testimony of
Daronn A. Williams

1 8. User friendly software for the Company

2 Q. Are there any other advantages or reasons why the conventional meters are being
3 replaced with AMI meters that have not already been discussed?

4 A. Yes. Based on Company's response to DR 0032, since the year 2020,
5 conventional meters have been replaced at the Company for some of the following reasons (in
6 addition to replacing aging meters with AMI meters): meters broke/not reading, illegal use,
7 installed backwards, leaking, meter stuck, and missing.

8 Q. Did Dr. Marke present any new evidence supporting his position in his
9 rebuttal testimony?

10 A. No, no new evidence was presented.

11 Q. Has Staff's position changed regarding AMIs?

12 A. No. Staff supports Commission approval of the Non Unanimous Disposition
13 Agreement.

14 Q. Does this conclude your rebuttal testimony?

15 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF DARONN A. WILLIAMS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW DARONN A. WILLIAMS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Daronn A. Williams*; and that the same is true and correct according to his best knowledge and belief.

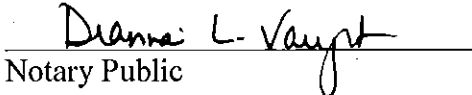
Further the Affiant sayeth not.



DARONN A. WILLIAMS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 7th day of November 2023.



Notary Public

