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Exhibit No. 205

OPC – Exhibit 205
Riley
Direct
File No. WR-2023-0344

Exhibit No.: _____
Issue(s): Meter Reading Payroll/Cash Working
Capital/Admin & General Salaries
Witness/Type of Exhibit: Riley/Direct
Sponsoring Party: Public Counsel
Case No.: WR-2023-0344

DIRECT TESTIMONY

OF

JOHN S. RILEY

Submitted on Behalf of the Office of the Public Counsel

RAYTOWN WATER COMPANY

CASE NO. WR-2023-0344

October 10, 2023

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DIRECT TESTIMONY
OF
JOHN S RILEY
RAYTOWN WATER COMPANY
CASE NO. WR-2023-0344

1 **Q. What is your name and what is your business address?**

2 A. John S. Riley, PO Box 2230, Jefferson City, Missouri 65102.

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

4 A. I am employed by the Missouri Office of the Public Counsel (“OPC”) as a Utility Regulatory
5 Supervisor.

6 **Q. What is your educational background?**

7 A. I earned a B.S. in Business Administration with a major in Accounting from Missouri State
8 University.

9 **Q. What is your professional work experience?**

10 A. I was employed by the OPC from 1987 to 1990 as a Public Utility Accountant. In this capacity,
11 I participated in rate cases and other regulatory proceedings before the Public Service
12 Commission (“Commission”). From 1994 to 2000 I was employed as an auditor with the
13 Missouri Department of Revenue. I was employed as an Accounting Specialist with the
14 Office of the State Court Administrator until 2013. In 2013, I accepted a position as the Court
15 Administrator for the 19th Judicial Circuit until April 2016 when I joined the OPC as a Public
16 Utility Accountant III. I have also prepared income tax returns, at a local accounting firm, for
17 individuals and small business from 2014 through 2017

18 **Q. Are you a Certified Public Accountant (“CPA”) licensed in the State of Missouri?**

19 A. Yes. As a CPA, I am required to continue my professional training by attending Missouri
20 State Board of Accountancy qualified educational seminars and classes. The State Board of

1 Accountancy requires that I spend a minimum of 40 hours a year in training that continues
2 my education in the field of accountancy.

3 **Q. Have you previously filed testimony before the Missouri Public Service Commission?**

4 A. Yes I have. A listing of my case filings is attached as JSR-D-1.

5 **Q. What is the purpose of your direct testimony?**

6 A. Raytown Water Company (“Raytown” or the “Company”) and Staff are proposing a revenue
7 requirement that is excessive for providing safe and adequate service to its customers. I will
8 be offering adjustments to Staff’s 120 day filing report, specifically adjusting Meter Reading
9 Expense, Cash Working Capital (“CWC”), and General Salaries.

10 **METER READING EXPENSE**

11 **Q. What costs are included in this account?**

12 A. Meter reading is an operational and maintenance expense account typically recorded in
13 account 902. The majority of the expense would be labor to take the meter readings for billing
14 purposes.

15 **Q. What is your proposed adjustment to this account balance?**

16 A. I am proposing that the \$170,755 balance in the 902 account be removed completely from the
17 revenue requirement.

18 **Q. What is your argument for the complete removal of this balance?**

19 A. The Company has undertaken a program to replace all of the meters in the service area with
20 AMI meters¹. These meters will not require manual, onsite physical readings in order to

¹ An explanation of the capabilities of these new AMI meters is included in Dr. Marke’s testimony. The cursory explanation for the purpose of my testimony is that the meters can transmit data to Raytown’s home office via a

1 establish water consumption for monthly billings. Meter reading should no longer be a valid
2 expense.

3 **Q. Only 45.12% of the meters had been installed by the end of the true-up period. That**
4 **leaves 54.88% of the meters still requiring manual examination. Why argue for all the**
5 **expense to be eliminated?**

6 A. The software and communication equipment for the entire meter replacement program is
7 already in place and being used. Additionally, the maintenance contract for this equipment is
8 over \$104,000 annually. Therefore, allowing both the manual meter reading expense and the
9 software/maintenance expense in the cost of service would be duplicative and counter-
10 productive. AMI has currently replaced over \$77,044 (45.12% of \$170,755) of this labor in
11 addition to the associated withholding tax and benefits. The contract cost is more than the
12 remaining balance of labor in the 921 account. With the advanced meter investment, the need
13 for manual meter reading should be completely eliminated. The Company's entire reason for
14 AMI meters is to create efficiency and eliminate expense.

15 **CASH WORKING CAPITAL ("CWC")**

16 **Q. Did Staff perform any CWC calculations for this rate case?**

17 A. No. The Staff accounting schedule, Schedule 08, would normally include CWC calculations
18 but Staff's included Schedule is incomplete. The Schedule only has a few starting balances,
19 but does not have any CWC calculations.

20 **Q. Did you complete a CWC schedule for this rate case?**

21 A. I did put together a schedule, however, I did not perform my own lead lag study or
22 independently establish the expenses included in the calculations. The individual account

WIFI connection. As Staff has explained in its report, approximately 46% of the meters had been installed by the true-up cut off and all of the remaining meters were to be installed by the end of 2023.

1 balances were extracted from the Cost of Service section of the Income Statement that Staff
2 included or from its workpapers. The revenue and expense lag figures were gathered from
3 the following cases: Raytown WR-2015-0246, Missouri-American WR-2022-0303,
4 Confluence Rivers WR-2023-0006 or Raytown WR-2020-0264. My CWC Schedule is
5 attached as Schedule JSR-D-02.

6 **Q. Could you provide a brief explanation of how CWC affects the revenue requirement**
7 **needs of the Company?**

8 A. Yes. As I don't see a need to re-invent the wheel, I'll quote the Staff definition that is
9 commonly used in its reports.

10 Cash Working Capital (CWC) is a **rate base component** that represents a
11 measurement of the amount of funds, on average, required for the **payment**
12 of a utility's day-to-day expenses, as well as an identification of whether a
13 utility's customers or its shareholders are responsible for providing these
14 funds in the aggregate. (Emphasis Added)

15 In a CWC calculation, both a revenue lag and an expense lag are measured. The "lag" is the amount
16 of time, usually in days, that it takes revenues to come in from the customer or the time it takes for the
17 utility to pay out an expense. The standard revenue lag for Raytown is 43 days in the cases I mentioned
18 above. Customer payments are fairly homogenous and this revenue lag is a consistent multiplier in
19 the calculation. In contrast, each expense component of the CWC calculation has a different payment
20 schedule based on when the individual expense needs to be paid. As a result, the expense lag is different
21 for each line item.

22 **Q. What are your initial CWC calculations for Raytown?**

23 A. There are two overall components in the CWC Schedule that flow to the rate base, Schedule
24 02: Additions to Net Plant and Subtraction from Net Plant. Normally, the amounts included
25 from CWC Operation and Maintenance Expense are positive and the Tax and Interest Offsets
26 are negative. In this particular case, both components are negative adjustments to Net Plant.
27 There are rate base additions of \$20,606 for Operation & Maintenance expense, with payroll

1 and property tax reductions of \$90,279. Put together, the CWC amount so far equals a
2 combined reduction of \$69,673.

3 Next, the Tax Offset Section. This section consists of annualized Federal and State tax
4 amounts calculated within the workpapers and displayed on the Income Tax Schedule 11, as
5 well as the expected Interest Expense. As shown on my JSR-D-02, these three amounts
6 combine to provide a negative (or subtraction) adjustment from the Net Plant of \$156,683.
7 The two sections combined create a negative addition of \$226,356.

8 **Q. Could you explain the math and the theory behind the three negative amounts in the**
9 **Tax Offset Section?**

10 A. The Federal and State Tax amounts used in the calculations are derived from Staff's income
11 tax calculations. I reviewed the Company's 2021 and 2022 income tax returns and found that
12 the Company has recorded taxable losses both years. Given that the installation of \$4 million
13 of AMI meters is well on its way in 2023; the accelerated depreciation will provide the
14 Company with taxable losses for 2023 as well.

15 **Q. Are these tax losses the basis of you applying a 365 day expense lag to the Federal and**
16 **State tax amounts?**

17 A. Yes. Staying consistent with the Commission's decision in Spire Case No. GR-2021-0108,
18 where tax expense amounts that were not being submitted to a taxing authority should be
19 provided a 365 expense lag within the CWC calculations. The 365 expense lag was applied
20 as well as the 43 day revenue lag to produce a lag factor of negative .8821918. The combined
21 tax total multiplied by the factor created a \$90,307 Tax offset to rate base.

22 The Staff listed \$174,297 as interest expense for the test year. I did not make adjustments to
23 this interest lead/lag. I applied the usual half year payment expense lag calculation to that
24 balance to generate a negative CWC requirement of \$66,376. Combined, the Tax Offset
from Rate

1 Base is a total of \$156,683. Adding the Operation & Maintenance CWC calculation (\$69,673)
2 with the Tax Offset (\$156,683) creates a reduction of Net Plant of (\$226,356).

3 **ADMIN & GENERAL SALARIES**

4 **Q. What concerns do you have with the proposed level of Administrative and General**
5 **Salaries?**

6 A. The level of overtime is excessive. It doesn't appear that either Staff or the Company is
7 concerned with this extra time at a rate of one and a half the hourly rate. Given Company
8 answer to OPC data requests 1209, Raytown expects to continue the amount of overtime into
9 the foreseeable future.

10 **Q. Were there any additional employees hired since the last case?**

11 A. There has been quite a bit of turnover through the years. The 2020 payroll had seven
12 employees that don't appear to be working for the Company now and the current payroll has
13 at least six new employees hired since the last rate case.

14 **Q. What explanation did the Company provide for the expected continued overtime within**
15 **the Company operations?**

16 A. Company answer to data request 1209 indicates "**There would be no expected reductions**
17 **in overtime. None of the new hires are assigned to the office work, so all overtime would**
18 **remain basically the same.**" (Schedule JSR-D-03, answers to OPC data requests)

19 **Q. Did Staff make any reduction to payroll for the overtime?**

20 A. No, in fact it appears that Staff built in the overtime as if it was standard pay with a COLA
21 increase to boot.

1 **Q. Do you see any unnecessary overtime built into the office payroll?**

2 A. Yes. The Company indicates that Ms. 'Chiki' Thompson is the only person in the Company
3 that has DS certification². Someone with this certification must be involved with repairs of
4 water breaks. Conventional wisdom would guide the Company to having the field employees
5 certified. That eliminates expensive overtime (\$80 an hour) and an unnecessary person on
6 site of a water break. The Company has had every opportunity to get the proper certification
7 for its field supervisor but apparently hasn't made that effort.

8 It's my understanding that everyone in the office has been promoted since the last rate case
9 yet no one addresses all this overtime. When I see these promotions, along with the personnel
10 shortfall, it leads me to ask if there was a Staff oversight. I wonder if the Company would
11 have any backup plan if Staff were to exclude the unsubstantiated overtime. Further, I wonder
12 what qualifications are required for promotions. Normally, the expectation would be for the
13 promoted workers to handle more duties, or handle their current duties better.

14 **Q. What Admin. & General Salaries are you proposing be eliminated from the cost of**
15 **service?**

16 A. Chiki Thompson's overtime pay, the associated Company match on the 401K and the
17 Company's portion of payroll taxes. As the answer to OPC data request 1203 indicates, Ms.
18 Thompson spends a great deal of time performing tasks that a DS certified field service
19 employee should be handling. Other such responsibilities should have been eliminated
20 through AMI meter installation.

21 Currently, Staff is allowing \$41,425 in overtime for Ms. Thompson, where all indications are
22 that the majority of this time should be eliminated due to duplication in the field or from the

² Answer to OPC data request 1203 included in JSR-D-03. DNR requires this oversight.

1 installation of AMI meters. Therefore, \$41,425 in salary, \$2,486 in 401K matching, and
2 \$3,169 in taxes should all be eliminated from the revenue requirement.

3 **Q. Does this conclude your direct testimony?**

4 A. Yes it does.

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

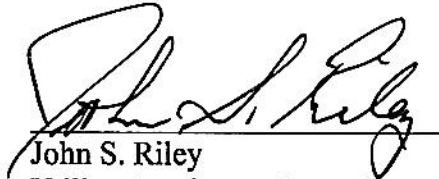
In the Matter of the Application of a Rate)
Increase of Raytown Water Company) Case No. WR-2023-0344

AFFIDAVIT OF JOHN S. RILEY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)


John S. Riley, of lawful age and being first duly sworn, deposes and states:

1. My name is John S. Riley. I am a Utility Regulatory Supervisor for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.


John S. Riley
Utility Regulatory Supervisor

Subscribed and sworn to me this 10th day of October 2023.

TIFFANY HILDEBRAND
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES AUGUST 8, 2027
COLE COUNTY
COMMISSION #15637121


Tiffany Hildebrand
Notary Public

My Commission expires August 8, 2027.

John S. Riley, CPA
Summary of Case Participation

ST LOUIS COUNTY WATER COMPANY	CASE NO. WR-88-5
SOUTHWESTERN BELL TELEPHONE COMPANY	CASE NO. TC-89-21
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. ER-2016-0023
KCP&L GREATER MISSOURI OPERATIONS COMPANY	CASE NO. ER-2016-0156
KANSAS CITY POWER & LIGHT COMPANY	CASE NO. ER-2016-0285
AMEREN MISSOURI	CASE NO. ER-2016-0179
EMPIRE DISTRICT ELECTRIC PRUDENCE REVIEW	CASE NO. EO-2017-0065
LACLEDE GAS COMPANY	CASE NO. GR-2017-0215
MISSOURI AMERICAN WATER COMPANY	CASE NO. WU-2017-0351
MISSOURI AMERICAN WATER COMPANY	CASE NO. WR-2017-0285
LIBERTY (MIDSTATE NATURAL GAS)	CASE NO. GR-2018-0013
KANSAS CITY POWER AND LIGHT	CASE NO. ER-2018-0145
KCP&L GREATER MISSOURI OPERATIONS COMPANY	CASE NO. ER-2018-0146
EMPIRE DISTRICT ELECTRIC PRUDENCE REVIEW	CASE NO. EO-2018-0244
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. ER-2018-0228
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. ER-2018-0366
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. EO-2018-0092
AMEREN GAS COMPANY	CASE NO. GR-2018-0227
MISSOURI AMERICAN WATER COMPANY	CASE NO. WO-2018-0373
LIBERTY UTILITIES EMPIRE ELECTRIC CO	CASE NO. EA-2019-0010
SUMMIT NATURAL GAS OF MISSOURI, INC	CASE NO. GR-2018-0230
SPIRE NATURAL GAS, EAST/WEST ISRS	CASE NO. GO-2019-0115
MISSOURI AMERICAN WATER COMPANY	CASE NO. WO-2019-0184

John S. Riley, CPA
Summary of Case Participation

AMEREN GAS	CASE NO. GR-2019-0077
UNION ELECTRIC COMPANY	CASE NO. ER-2019-0335
LIBERTY EMPIRE ELECTRIC CO.	CASE NO. ER-2019-0374
EVERGY MISSOURI METRO	CASE NO. EO-2020-0262
MISSOURI AMERICAN WATER CO.	CASE NO. WO-2020-0190
EMPIRE ELECTRIC COMPANY FAC	CASE NO. ER-2020-0311
MISSOURI AMERICAN WATER CO.	CASE NO. WR-2020-0344
SPIRE MISSOURI INC	CASE NO. GR-2021-0108
UNION ELECTRIC COMPANY	CASE NO. ER-2021-0240
EMPIRE ELECTRIC COMPANY	CASE NO. ER-2021-0312
EMPIRE DISTRICT GAS COMPANY	CASE NO. GR-2021-0320
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. EO-2022-0040
EMPIRE DISTRICT ELECTRIC COMPANY	CASE NO. EO-2022-0193
EVERGY MISSOURI WEST SECURITIZATION	CASE NO. EF-2022-0155
EVERGY MISSOURI WEST	CASE NO. ER-2022-0130
EVERGY MISSOURI EAST	CASE NO. ER-2022-0129
SPIRE MISSOURI, INC.	CASE NO. GR-2022-0179
UNION ELECTRIC COMPANY	CASE NO. ER-2022-0337

Raytown Water Co.
WR-2023-0344

B	C	D	E	F	G
TEST YEAR	REV LAG	EXP LAG	NET C-D	FACTOR E/365	CWC REQ BxF

Base Payroll	\$ 292,954	43	12.38	30.62	0.08389	\$ 24,576	
Withholding Tax	\$ -	43					
Pension & Employee Benefits	\$ 344,617	43	39.35	3.65	0.01	\$ 3,446	
		43	39.51				
Office Supplies and Expenses	\$ 219,075	43	39.5	3.5	0.009589	\$ 2,101	
		43	43				
Purchased Water	\$ 1,396,830	43	29.3	13.7	0.037534	\$ 52,429	
PSC Assessment	\$ 45,475	43	182.5	-139.5	-0.38219	\$ (17,380)	
Cash Vouchers	\$ 4,181,613	43	46.89	-3.89	-0.01066	\$ (44,566)	
TOTAL OPERATION AND MAINT. EXPENSE						\$ 20,606	
TAXES							
Employer Portion of Payroll	\$ 80,063	43	15.5	27.5	0.075342	\$ 6,032	
Property Tax	\$ 144,427	43	286.4	-243.4	-0.66685	\$ (96,311)	
TOTAL TAXES	\$ 224,490					\$ (90,279)	
CWC REQ'D BEFORE RATE BASE OFFSET						\$ (69,673)	\$ (69,673)
TAX OFFSET FROM RATE BASE							
Federal Tax	\$ 86,930	43	365	-322	-0.88219	\$ (76,689)	
State Tax	\$ 15,437	43	365	-322	-0.88219	\$ (13,618)	
Interest Expense	\$ 174,297	43	182	-139	-0.38082	\$ (66,376)	
TOTAL OFFSET FROM RATE BASE						\$ (156,683)	\$ (156,683)
Total Plant Reduction							\$ (226,356)

SCHEDULE JSR-D-02

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