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Projects
Witness: Bruce Robinson
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(Missouri Water) LLC d/b/a Liberty
Case Nos.: WR-2024-0104 and
SR-2024-0105
Date Testimony Prepared: March 2024

**Before the Public Service Commission
of the State of Missouri**

Direct Testimony

of

Bruce Robinson

on behalf of

Liberty Utilities (Missouri Water) LLC d/b/a Liberty

March 13, 2024



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FOR THE DIRECT TESTIMONY OF BRUCE ROBINSON
LIBERTY UTILITIES (MISSOURI WATER) LLC D/B/A LIBERTY
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
CASE NOs. WR-2024-0104 and SR-2024-0105

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Bruce Robinson. My business address is 602 South Joplin Avenue, Joplin,
4 MO, 64802.

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

6 A. I am employed by Liberty Utilities Service Corp. (“LUSC”) as Operations Manager for
7 water and wastewater operations in the Liberty Central Region.

8 **Q. On whose behalf are you testifying in this proceeding?**

9 A. I am testifying on behalf of Liberty Utilities (Missouri Water) LLC d/b/a Liberty
10 (“Liberty” or the “Company”).

11 **Q. Please describe your educational and professional background.**

12 A. I have 22 years of experience in the water and wastewater industries. I hold Missouri
13 A-Treatment, DS-III and B Wastewater certifications. I also hold Arkansas Grade 4
14 Treatment, Grade 4 Distribution, Grade III Wastewater and Grade III Basic Industrial
15 Wastewater certifications.

16 **Q. What is the purpose of your direct testimony in this proceeding?**

17 A. The purpose of my testimony is multifaceted. I will provide testimony on the following
18 items:

- 19
- Description of Liberty’s water and wastewater systems in Missouri;
 - Investments made in Liberty’s water and wastewater systems since the last rate
20 case, including implementing Advanced Metering Infrastructure (“AMI”) (refer
21

1 to Direct Schedule BR-1 for a detailed listing and description of all projects
2 added greater than \$50,000 since the last rate case); and
3 • Future projects and investments to be made in the Liberty water and wastewater
4 systems.

5 **II. DESCRIPTION OF LIBERTY'S WATER AND WASTEWATER SYSTEMS**

6 **Q. Please describe Liberty's water and wastewater systems in Missouri.**

7 A. Liberty currently provides water and/or wastewater service to approximately 17,000
8 connections in Butler, Cape Girardeau, Christian, Franklin, Jefferson, Lawrence,
9 McDonald, Polk, Stoddard, Stone, Taney and Wayne Counties, Missouri. Since
10 Liberty's last rate case, the Company has acquired the water assets of The Empire
11 District Electric Company, Bolivar, Roger Owens Properties (Lakeland Heights,
12 Whispering Hills, and Oak Brier), Ozark International Properties (Midland Water,
13 Bilyeu Ridge, Moore Bend, River Fork, Taney County, and Valley Woods Water), and
14 Franklin County Water. Liberty has also acquired the wastewater assets of Bolivar,
15 Savers Farm, Valley Woods, and RD Sewer. A more detailed description of the
16 acquisitions can be found in Liberty witness Antonio Penna's direct testimony.

17 **III. INVESTMENTS SINCE LAST RATE CASES**

18 **Q. Has Liberty made significant upgrades or improvements to its system since its last
19 water and wastewater rate cases in 2018?**

20 A. Yes. Based on the condition of its assets, both those that were owned as of the last rate
21 cases and those that have been acquired since those cases, Liberty has made significant
22 capital investment in its water and wastewater facilities.

23 **Q. What capital investments have been made by Liberty since its last water and
24 wastewater rate cases?**

1 A. In order to provide reasonable, safe, adequate, and sufficient service to our customers,
2 the Company makes ongoing investments in its water and wastewater systems. Since
3 the last rate case through the Company's test year ending December 31, 2022, and
4 through the proposed update period ending April 30, 2024, Liberty plans to have
5 invested approximately \$19,578,022 in capital improvements and upgrades to the
6 systems. **Direct Schedule BR-1** provides a summary and brief description of all capital
7 improvements and upgrades over \$50,000.

8 **Q. Was the amount of capital investment necessary for Liberty to provide safe and**
9 **adequate service?**

10 A. Yes. The improvements to Liberty's water and wastewater systems primarily revolved
11 around upgrades, including improvements to Source of Supply Plant, Pumping Plant,
12 Wastewater Treatment Plant, Distribution System, Wastewater Collection Plant, and
13 General Plant. General descriptions of those updates are as follows:

14 • **Source of Supply Plant** – The source of supply investments denote the
15 infrastructure needed to extract water from the aquifer, add disinfectant and send the
16 water to the Distribution System. The Company has continued to invest in this area to
17 ensure reliable water supply to its customers.

18 • **Wastewater Treatment Plant** - Plant devoted to the removal and elimination
19 of contaminants from wastewater and conversions into an effluent that can be returned
20 to the water cycle.

21 • **Pumping Plant** – The pumping plant investments denote the infrastructure and
22 equipment needed to keep pressure on the water system to ensure reliable delivery of
23 water on demand.

1 • **Distribution System** – The distribution system investments denote the
2 infrastructure needed to carry the commodity from the source of supply to the customer.
3 For example, piping, valves, hydrants, blow-offs, and meters.

4 • **Wastewater Collection Plant** – Plant utilized to convey wastewater and solids
5 to a wastewater treatment plant.

6 • **General Plant** – The general plant investments denote the investments that are
7 necessary to support the general operation of the Company.

8 **Q. Please provide specific examples of upgrades and improvements made within the**
9 **categories listed above.**

10 A. The below investments were necessary to provide safe and reliable service to Liberty
11 customers and were prudently incurred.

12 • **Backup generators:** Liberty installed new emergency backup generators to
13 wells located at Oak Brier Estates, Whispering Hills, Lakeland Heights, Midland,
14 Bilyeu Ridge, Riverfork, Bolivar, Valley Woods, and High Ridge Manor. Prior to the
15 installation of the backup generators, Liberty customers experienced water outages due
16 to electrical outages at the wells. The new generators will alleviate those outages and
17 will provide reliable water service to customers during a power outage.

18 • **Well Monitoring:** Liberty has equipped all of its water wells with monitoring
19 systems to inform the Company of any abnormalities like loss of pressure, power,
20 chlorine residuals, etc. These systems greatly improve the availability of the system to
21 customers as Liberty can respond faster to a problem.

22 • **Wastewater Upgrades:** To meet the Missouri Department of Natural
23 Resources' ("DNR") requirements, Liberty made ammonia and E.coli emission
24 upgrades to its Savers Farm and Cape Rock wastewater systems. Liberty installed

1 Moving Bed Biofilm Reactor (“MBBR”) and Ultraviolet systems that aid in the
2 digestion process of the wastewater and sterilization of E.coli, respectively. Currently,
3 the Company is making the same upgrades to its RD Sewer system, which should be
4 completed by December 31, 2024. Along with meeting state requirements, these
5 upgrades increase the safety of Liberty’s wastewater for its customers. Liberty has also
6 rebuilt the wastewater lift station at its Ozark Mountain Sewer, Bolivar, Timber Creek,
7 Cape Rock, RD Sewer and Valley Woods systems.

8 • **Updates at Valley Woods:** When Liberty purchased the Valley Woods system
9 in 2020, it was out of compliance with the DNR requirements for ammonia and E.coli.
10 Liberty worked diligently after the acquisition to get Valley Woods back in compliance
11 with DNR.

12 • **Main Replacements in Taney County:** When Liberty purchased the Venice
13 on the Lake system, its infrastructure was in great need of repair. As detailed by Liberty
14 witness Antonio Penna, the Company now has an Owner Supervised Program through
15 the Missouri Department of Natural Resources to further address issues with this
16 system.

17 • **Security Upgrades:** Due to the recent increase in planned attacks on utility
18 systems across the United States, Liberty installed additional fencing and gates to
19 increase employee safety and better safeguard Company assets.

20 **Q. Has Liberty continued to make capital investments during the pro forma period?**

21 A. Yes. Liberty continues to make investments in the water system to provide quality and
22 reliable service. Continued investments in 2023 and 2024 include installation of mains,
23 hydrants, service line pipe replacements, and meters, among other things. These
24 projects were necessary upgrades to the Liberty water system projects that will be

1 completed by April 30, 2024, and have been requested to be included in rate base in a
2 pro forma adjustment.

3 **Q. Do you have a detailed list and description of the projects that have been**
4 **completed in 2023?**

5 A. Yes. On February 28, 2024, in File No. WO-2022-0253, the Company filed its 2023
6 Asset Management and Capital Improvement Plan (the “Report”), which provides
7 considerable detail as to the system improvements that were made in 2023. Among
8 other things, the Report describes such improvements by service area. The Report is
9 attached hereto as **Direct Schedule BR-2**. Portions of **Direct Schedule BR-2** have
10 been designated Confidential pursuant to Commission Rule 20 CSR 4240-
11 2.135(2)(A)8.

12 **IV. AMI METERS**

13 **Q. What is AMI?**

14 A. AMI, or Advanced Metering Infrastructure, is an integrated system of meters,
15 communications networks, and data management systems that enables two-way
16 communication between utilities and customers. Most importantly, it allows remote
17 reading of our meters at customers’ homes and businesses.

18 **Q. Are there benefits associated with AMI?**

19 A. Yes. From an operational perspective, with the installation of this new AMI technology,
20 the Company is able to reduce the amount of time to drive and read meters, in doing so
21 this improves employee and public safety. Being able to read meters remotely reduces
22 the potential risk of both injuries to our employees and injuries and damage to third
23 parties.

1 Utilizing AMI can also create operational efficiency. In the past, when a service order
2 was issued, a field technician would have driven to the premises to obtain a current
3 meter reading. When the AMI system is fully operational, a Liberty Customer Service
4 Representative (“CSR”) would generally have this information readily available,
5 minimizing the need for a field technician to drive to the premises which would
6 enhance our customer service.

7 **Q. Has Liberty been working to install AMI meters?**

8 A. Yes. As of the date of this filing, Liberty has been working to install new AMI meters
9 in the areas where the organization’s electric infrastructure supports such meters. The
10 city of Bolivar and parts of Taney County will likely be the next areas of
11 implementation.

12 **V. FUTURE PROJECTS AND INVESTMENTS**

13 **Q. Does Liberty have a planning process for capital investment projects?**

14 A. Yes. Liberty has a comprehensive capital planning process that assesses capital
15 investment needs for all aspects of operations and assigns funding to capital programs
16 on a prioritized basis.

17 **Q. Please describe Liberty’s comprehensive capital planning process.**

18 A. The planning process begins with the development of anticipated demand projects and
19 regulatory requirements of the system, the identification of improvements needed to
20 meet those demands, and the adoption of strategies to correctly prioritize and distribute
21 capital spending for the various needs of the Company. A key component of the
22 planning technique is that it is flexible and can be adjusted as necessary to address new
23 needs such as unplanned equipment failures or a new regulatory requirement, with an

1 eye to hardening the systems to improve reliability and planning for increased capacity
2 needs.

3 **Q. Please describe any future investments or projects that Liberty has planned for**
4 **its Missouri water and wastewater systems through April 30, 2024.**

5 A. To further improve the reliability of Liberty's water and wastewater systems, the
6 Company has purchased five more back-up generators that have been installed at
7 Valley Woods, Midland, Bilyeu Ridge, River Fork, Ozark Mountain, and Holiday
8 Hills. The Company is also planning to invest in cyber security and other technological
9 upgrades to secure and improve the safety of resources.

10 **Q. Are these projects planned to be in-service by April 30, 2024?**

11 A Yes, at the time of the adjustment these amounts were anticipated to be in service by
12 April 30, 2024.

13 **Q. Please describe proposed projects for 2024.**

14 A. General descriptions are listed below:

15 • **Ozark Mountain Water:** As discussed in the direct testimony of Antonio
16 Penna, Liberty plans to replace the Ozark Mountain Resort Well No. 1 Ground Storage
17 Tank.

18 • **Generators:** Liberty intends to purchase and install new generators for Taney
19 County Water, Moore Bend Water and KMB Water.

20 • **Noel Water:** Liberty plans to install a new high service pump station to better
21 push water from east-to-west in town.

22 • **RD Sewer:** Additional plant upgrades will be completed in 2024 at RD Sewer.

1 VI. CONCLUSION

2 Q. Does this conclude your direct testimony at this time?

3 A. Yes.

VERIFICATION

I, Bruce Robinson, under penalty of perjury, on this 13th day of March 2024, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Bruce Robinson