

FILED
December 7, 2017
Data Center
Missouri Public
Service Commission

Exhibit No.: 113
Issue: ~~Need for~~ Distribution System
Rehabilitation
Witness: David A. Spratt
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: WR-2017-0259
Date Testimony Prepared: November 13, 2017

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

WATER AND SEWER DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DAVID A. SPRATT

~~Staff~~ Exhibit No. 113
Date 11-21-17 Reporter KS
File No. WR-2017-0259

INDIAN HILLS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2017-0259

*Jefferson City, Missouri
November 2017*

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SURREBUTTAL TESTIMONY

OF

DAVID A. SPRATT

INDIAN HILLS UTILITY OPERATING COMPANY, INC.

CASE NO. WR-2017-0259

6 Q. Please state your name and business address.

7 A. David A. Spratt, 200 Madison Street, Suite 500, Jefferson City, MO 65101.

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

9 A. I am a Utility Operations Technical Specialist II in the Water and Sewer
10 Department ("Staff") for the Missouri Public Service Commission ("Commission").

11 Q. Are you the same David Spratt that authored direct testimony in this case?

12 A. Yes I am.

13 Q. What is the purpose of your testimony?

14 A. The purpose of my testimony is to rebut a portion of the testimony by Office of
15 the Public Counsel ("OPC") witness John Robinett where he states "...repair costs are likely
16 imprudent on a going forward basis because of the substandard material and the mains and
17 service connections need to be replaced."

18 Q. Does Staff agree with this position?

19 A. No. Precisely because of the current condition of the piping and materials in the
20 ground, ongoing repairs will continue to be necessary. Failure to repair a leaking service line or
21 main can result in a loss of service to customers, damage to property, as well as an economic
22 hardship on the company.

Surrebuttal Testimony of
David A. Spratt

1 Q. In your direct testimony, you say that Staff and the Company agree that
2 replacement is a better alternative than repairs. Are you changing your stance on that?

3 A. No. Replacement of service lines and mains is still going to be necessary but they
4 would be most efficiently done through a systematic replacement program. For example, the
5 main and service connections along an entire street should all be replaced at once. However,
6 while this replacement program is ongoing, individual repairs must still be made. Therefore,
7 ongoing repair costs are prudent, and unavoidable.

8 Q. Has the Company agreed to perform a systematic main replacement program for
9 the Indian Hills Utility Operating Company, Inc.'s service territory?

10 A. Yes. Please see Item (7) of the signed partial disposition agreement as referenced
11 in Jennifer Grisham's rebuttal testimony.

12 Q. Does this conclude your testimony?

13 A. Yes, it does.

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

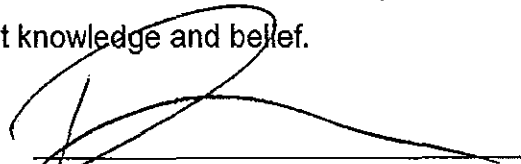
In The Matter of The Rate Increase Request Of)
Indian Hills Utility Operating Company, Inc.) Case No. WR-2017-0259

AFFIDAVIT OF DAVID A. SPRATT

State of Missouri)
) ss
County of Cole)

COMES NOW David A. Spratt, and on his oath declares that he is of sound mind and lawful age; that he contributed to the attached *Surrebuttal Testimony*; and that the same is true and correct according to his best knowledge and belief.

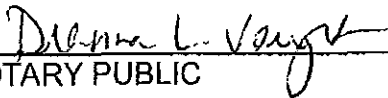
Further the Affiant sayeth not.



David A. Spratt

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 13th day of November, 2017.



NOTARY PUBLIC

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: June 26, 2019 Commission Number: 15207377
