

Exhibit No.: _____
Issues: Rate Design/Class Cost of Service
Witness: Renee Meyer
Type of Exhibit: Direct Testimony
Sponsoring Party: The City of Bolivar
File Nos.: WR-2024-0104 and SR-2024-0105

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
FILE NOS. WR-2024-0104 and SR-2024-0105**

DIRECT TESTIMONY

OF

RENEE MEYER

ON BEHALF OF

THE CITY OF BOLIVAR

SEPTEMBER 10, 2024

1 **I. INTRODUCTION OF WITNESS AND TESTIMONY**

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

3 A. My name is Renee Meyer. I am the Chief Financial Officer for Citizens Memorial
4 Hospital. My business address is 1500 N. Oakland, Bolivar, Missouri.

5 **Q. Please describe your professional background.**

6 A. I have worked for Citizens Memorial Hospital since September 29, 1992, and been in
7 Management since 1997. I have served in my current position as Chief Financial Officer
8 since January 2020.

9 **Q. On whose behalf are you testifying?**

10 A. I am testifying on behalf of the City of Bolivar, an intervenor in this proceeding.

11 **Q. Have you previously testified before the Missouri Public Service Commission?**

12 A. No.

13 **Q. What is the purpose of your testimony?**

14 A. In these two cases, Liberty proposed to more than double its rates to Bolivar water
15 customers, and to either reduce its rates to Bolivar sewer customers or pass along excess
16 Bolivar sewer revenues to Liberty's sewer customers in other service areas. Citizens
17 Memorial Hospital is now a Liberty water and sewer customer in Bolivar. Because
18 Liberty's statements in these two cases are significantly different from its representations
19 and commitments to Citizens Memorial Hospital during the 2019-2022 time period that
20 Liberty sought Citizens Memorial Hospital's approval to buy Bolivar's water and sewer
21 systems, I offer my testimony so that this Commission will have a full and fair record of
22 factual evidence upon which to ground the final order it enters in these cases.

1 **Q. Please summarize your testimony.**

2 A. In 2020, Citizens Memorial Hospital was told by Liberty – through its website and in
3 public meetings – that sewer rates would increase by 38% if the City continued to operate
4 the systems, but that Liberty wouldn't seek to raise its sewer rates until 2024, and then by
5 no more than 19%. All information and discussion was at that time focused on sewer
6 rates. Citizens Memorial Hospital then supported the sale of Bolivar's water and sewer
7 systems to Liberty. Now, Liberty proposes to decrease our sewer rates, or share our
8 excess sewer revenue with Liberty's other customers, while more than doubling our water
9 rates. Such an increase in our water rates would be an unfair, unexpected and
10 extraordinary expense which would force Citizens Memorial Hospital to curtail or
11 eliminate some facilities and/or services. And, Citizens Memorial Hospital is concerned
12 that Liberty intends to follow these two cases with another rate case seeking extraordinary
13 increases in our sewer rates.

14 **II. Liberty's Prior Representations to Citizens Memorial Hospital**

15 **Q. Did Liberty make any statements or promises to Citizens Memorial Hospital that**
16 **persuaded the hospital to support the sale of Bolivar's water and sewer systems to**
17 **Liberty?**

18 A. I recall that Liberty set up a website, and I understand that it is still operable, and the
19 address is: <https://betterwaterbolivar.com>. I have attached the print-out of that website's
20 content as Schedule RM-1, and I understand that Liberty produced this print-out in
21 response to Data Request 0005 of the Office of Public Counsel.

1 Q. **Did Liberty in its website make any statements about the water and sewer rates that**
2 **the hospital might expect if Bolivar's systems were kept by the City or instead sold**
3 **to Liberty?**

4 A. I recall that we were told that the sewer system needed repairs, and that the City would
5 have to increase sewer rates by 38%. The print-out of the website matches my
6 recollection of that statement, and also the statement that Liberty's sewer rates would be
7 less than what the City would have to charge because Liberty would spread the costs of
8 repairing the sewer system across more customers.

9 Q. **Was the hospital given any other information about the sale of Bolivar's water and**
10 **sewer systems to Liberty?**

11 A. Yes. There were public meetings held in early 2020 before the election. At those public
12 meetings, Liberty gave a slideshow presentation. I have attached a print-out of that
13 Liberty slideshow presentation as Schedule RM-2, and I understand this was produced by
14 Liberty in response to Bolivar's Data Requests BOL-11 and BOL-12.

15 Q. **Did Liberty in its slideshow presentation make any statements about the water and**
16 **sewer rates that the hospital might expect if Bolivar's water and sewer systems were**
17 **kept by the City or instead sold to Liberty?**

18 A. Yes, I learned from others that Liberty presented a table of Bolivar's engineers' estimated
19 costs for repairs to the City's sewer systems which were predicted to raise Bolivar's
20 volumetric sewer rates so that monthly bills would increase anywhere from \$48 to \$376.
21 In the alternative, Liberty promised to hold off on any rate increase until 2024 and said
22 that it would then request a monthly increase in the range of \$8.22 to \$9.52, or 19%.

1 **Q. Did Citizens Memorial Hospital then support Bolivar’s sale of its water and sewer**
2 **systems to Liberty?**

3 A. Yes.

4 **III. Liberty’s Requests Regarding Water and Sewer Rates Will Harm**
5 **Citizens Memorial Hospital**

6 **Q. Was the hospital surprised to learn that Liberty is in these two cases proposing to**
7 **more than double its water rates?**

8 A. Yes, very surprised. Just a little over a month ago, Liberty sent its “Notice of Public
9 Hearings in Liberty’s Water and Wastewater Rate Cases” along with that month’s bill.
10 That Notice included a chart (which I’ve attached to my testimony as Schedule RM-3)
11 that shows Bolivar’s water rates will more than double if Liberty gets what it is asking for
12 in these two cases.

13 **Q. If Liberty succeeds in more than doubling its Bolivar water rates, what will be the**
14 **effect on the hospital’s facilities and services?**

15 A. Because of Liberty’s proposal to increase water rates by 130.37%, the estimated annual
16 increase in the cost of water will be approximately \$104,561.00. Since Citizens
17 Memorial Hospital cannot increase its bills to patients in this amount, this increase will
18 have to be offset by reducing other expenses which will likely reduce services offered to
19 patients.

20 **Q. Does this conclude your pre-filed direct testimony in this case?**

21 A. Yes. However, I wish to preserve the right to provide additional pre-filed testimony or at
22 the hearing to rebut the testimony of any other party.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

STATE OF MISSOURI)
) SS
COUNTY OF POLK)

AFFIDAVIT OF RENEE MEYER

Renee Meyer, being first duly sworn, deposes and says that she is the witness who sponsors the accompanying direct testimony and schedules; that said testimony was prepared by her or under her direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, she would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of her knowledge, information, and belief.

Renee Meyer
Renee Meyer

Subscribed and sworn to before me this 29th day of August, 2024.

Amanda Faye Parks
Notary Public

My commission expires: 11-23-25

