

*Exhibit No.:*  
*Issue(s):* Normalization of  
Residential Customer  
Usage & Tariff  
Consolidation  
*Witness:* Jarrod J. Robertson  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Rebuttal Testimony  
*Case No.:* WR-2024-0104  
*Date Testimony Prepared:* September 27, 2024

# **MISSOURI PUBLIC SERVICE COMMISSION**

## **INDUSTRY ANALYSIS DIVISION**

### **WATER, SEWER & STEAM DEPARTMENT**

#### **REBUTTAL TESTIMONY**

**OF**

**JARROD J. ROBERTSON**

**LIBERTY UTILITIES (Missouri Water), LLC,  
d/b/a Liberty**

**CASE NO. WR-2024-0104**

*Jefferson City, Missouri  
September 2024*



1           A.     I will address the method utilized by Liberty Water to normalize/weatherize  
2 residential customer usage for the year 2022 for Bolivar, specifically for the months of  
3 January and February.

4           Q.     What method did Liberty Water utilize for normalization/weatherization) of the  
5 Bolivar residential water customers for the months of January and February, 2022?

6           A.     According to page 9 of Thomas O’Neill’s direct testimony, “an average was  
7 taken only from ‘Lower Band’ consumption months as determined by the data available.”

8           Q.     What constitutes, “lower band consumption”?

9           A.     According to Witness O’Neill’s direct testimony, “Lower Band months in this  
10 adjustment were considered months of available data that contained less than 9% of the total  
11 Bolivar Consumption available for Residential Water service. These months were March, May  
12 and December for Residential Water service.”

13          Q.     Does this method actually weatherize data?

14          A.     No. Witness O’Neill makes statements about seasonality, but this is clearly  
15 not weatherization.

16          Q.     Is this a reasonable method to utilize in order to normalize usage?

17          A.     No. While this method does provide an average residential customer usage  
18 figure, it does not consider an appropriate sample with which to calculate this average.

19          Q.     Is there any value or relevance to Thomas O’Neill’s analysis?

20          A.     No. Thomas O’Neill’s effort at normalization and weatherization does not have  
21 value or significant relevance to this case, as it is based on questionable usage data, and utilizes  
22 an inappropriate sample with which to derive its calculations.

1 Q. What method would Staff undertake in order to normalize residential customer  
2 usage for the months of January and February, 2022?

3 A. Staff would have proposed to calculate an average of available ‘like’ months  
4 (same season), such as November, December (same year) and/or utilize existing data from  
5 January and February, 2023 and 2024. Then, calculate an average customer count for said  
6 months, and utilizing the average usage totals and average customer count, calculate an average  
7 usage per customer per day. This figure can then be utilized to calculate usage totals for the  
8 months of January and February, 2022, by multiplying the average usage totals for those months  
9 versus the known customer counts for January and February, 2022.

10 Q. Did Staff perform this calculation?

11 A. No.

12 Q. Why did Staff not perform this calculation?

13 A. With Liberty Water residential usage being too questionable overall to  
14 normalize, as further detailed in Staff Witness Michael Irwin’s rebuttal testimony, this task was  
15 not pertinent.

16 Q. What would you like to address regarding Haley Sirmon’s direct testimony and  
17 consolidation of the water and sewer tariff books?

18 A. I will address the results of my review of the proposed consolidated tariff books  
19 submitted by Liberty Water.

20 Q. What are the results of your review?

21 A. It appears that Liberty Water omitted the Aurora, Marionville and Verona  
22 systems from its consolidated water tariff book. The names of the systems will need to be

Rebuttal Testimony of  
Jarrod J. Robertson

1 identified in a revised version of the consolidated water tariff, along with insertion of the  
2 service area maps and legal descriptions prior to them being approved by the Commission.

3 Q. Are there any other irregularities regarding the proposed consolidated  
4 tariff books?

5 A. Yes, on page 34 of the proposed consolidated sewer tariff there is an error in  
6 spacing that has resulted in item C being combined with item B of Rule 5 – Inside Piping and  
7 Customer Service Sewer.

8 Q. Does this conclude your rebuttal testimony?

9 A. Yes it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Request of Liberty Utilities )  
(Missouri Water) LLC d/b/a Liberty for )  
Authority to Implement a General Rate )  
Increase for Water and Wastewater Service )  
Provided in its Missouri Service Areas )

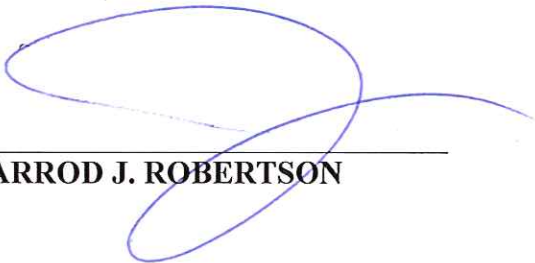
Case No. WR-2024-0104

**AFFIDAVIT OF JARROD J. ROBERTSON**

STATE OF MISSOURI     )  
                                  )     ss.  
COUNTY OF COLE     )

**COMES NOW JARROD J. ROBERTSON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Jarrod J. Robertson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JARROD J. ROBERTSON**

**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 23<sup>rd</sup> day of September 2024.

**D. SUZIE MANKIN**  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Cole County  
My Commission Expires: April 04, 2025  
Commission Number: 12412070

  
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Notary Public