

Exhibit No.: \_\_\_\_\_  
Issues: Bolivar and Other Improvements  
Witness: Bruce Robinson  
Type of Exhibit: Rebuttal Testimony  
Sponsoring Party: Liberty Utilities  
(Missouri Water) LLC d/b/a Liberty  
Case No.: WR-2024-0104  
Date Testimony Prepared: September 2024

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

**Rebuttal Testimony**

**of**

**Bruce Robinson**

**on behalf of**

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

**September 27, 2024**



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LIBERTY UTILITIES (MISSOURI WATER) LLC D/B/A LIBERTY  
BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
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BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
CASE NO. WR-2024-0104

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. **Are you the same Bruce Robinson who provided direct testimony in this matter  
6 on behalf of Liberty Utilities (Missouri Water) LLC d/b/a Liberty (“Liberty” or  
7 the “Company”)?**

8 A. Yes.

9 Q. **What is the purpose of your rebuttal testimony in this proceeding before the  
10 Missouri Public Service Commission (“Commission”)?**

11 A. I will be addressing certain aspects of the direct testimony of Commission Staff  
12 witnesses Andrew Harris and Daronn Williams as to Liberty’s planning, operations and  
13 future improvements.

14 II. **BOLIVAR IMPROVEMENTS**

15 Q. **Staff witness Harris describes several challenges associated with the Bolivar sewer  
16 system such as sanitary sewer overflows, inability to meet discharge limits of its  
17 permit and necessary bypasses of the treatment plant equipment during  
18 significant rain events. (Harris Dir., p. 2). Do you agree with Mr. Harris’ general  
19 description of the challenges?**

20 A. Yes.

1 **Q. Mr. Harris also describes many of the actions taken by Liberty in regard to**  
2 **Bolivar and its future plans. (Harris Dir., pp. 2-7). Do you have a summary of**  
3 **those actions and planned actions?**

4 A. Yes. Attached as Rebuttal Schedule BR-1 is a timeline graph that indicates the start  
5 and completion, or planned completion, dates of the many projects associated with the  
6 Bolivar systems.

7 **Q. What are the most recent actions that have been taken in regard to the Bolivar**  
8 **systems?**

9 A. As mentioned by Liberty witness Penna, Liberty has received a flow study and  
10 performed a smoke test of the worst portions of the collection system. Results of this  
11 test have been received and inflow and infiltration entry points have been identified.  
12 Liberty will next work toward addressing the issues.

13 **Q. What steps have been taken specifically in regard to the wastewater treatment**  
14 **facility?**

15 A. Liberty has submitted a preliminary plan to the Missouri Department of Natural  
16 Resources (DNR). It has further identified and prioritized five phases of the wastewater  
17 treatment facility plant improvements and issued a request for bidding on the project.  
18 The project pre-bid meeting was held September 12, 2024, with five prospective  
19 bidders in attendance.

20 **III. OTHER IMPROVEMENTS**

21 **Q. Staff witness Williams mentions that the Staff also found operational issues at the**  
22 **Venice on the Lake water system, Savers Farm sewer system, R.D. Sewer system**  
23 **and Cape Rock Village sewer system. (Williams Dir., p. 3). Was Liberty aware of**  
24 **the matters discussed by Mr. Williams?**

1 A. Yes, we were aware of these matters. Additionally, as mentioned by Mr. Williams, we  
2 previously met with Staff to discuss our approach to these issues.

3 **Q. As to Savers Farm, Mr. Williams describes various permit parameter issues. (Dir.**  
4 **p. 6). What steps has Liberty taken to address those issues?**

5 A. We identified several distribution laterals that were plugged and not evenly  
6 distributing, in addition, we identified recirculating zone valves that were not  
7 functioning properly and were not utilizing the entire pea gravel bed for treatment.  
8 These issues have since been corrected. The Company also checked and cleaned UV  
9 lights for proper intensity and plans to schedule removal of sludge from holding tanks.

10 **Q. Staff witness Williams also describes permit parameter exceedance as to the R.D.**  
11 **Sewer system. (Williams Dir., p. 7). What steps has Liberty taken to address those**  
12 **issues?**

13 A. As mentioned by Mr. Williams, there is an Abatement Order on Consent (“AOC”) with  
14 the Missouri Department of Natural Resources (“DNR”) that requires Liberty to make  
15 several plant upgrades. Currently, the AOC requires that those upgrades be made by  
16 June 30, 2025.

17 **Q. Mr. Williams indicated that Liberty planned to have the improvements finished**  
18 **by mid-September 2024. (Williams Dir., p. 8). What is the status of the R.D Sewer**  
19 **improvements?**

20 A. The R.D. Sewer plant improvements/upgrades have been completed. The contractor is  
21 currently finishing the construction “statement of work completed” for submission to  
22 DNR. Full compliance will take some time as the plant needs to seed and grow bacteria  
23 for the biological treatment to take effect.

1 **Q. Staff witness Williams also mentions a history of past parameter exceedance at**  
2 **the Cape Rock Village sewer system. (Williams Dir., p. 8). What is the status of**  
3 **that system?**

4 A. Liberty completed major upgrades to this system in 2022. As mentioned by Mr.  
5 Williams, there has not been any parameter exceedance since the completion of these  
6 upgrades.

7 **Q. Does this conclude your rebuttal testimony at this time?**

8 A. Yes.

**VERIFICATION**

I, Bruce Robinson, under penalty of perjury, on this 27th day of September, 2024,  
declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Bruce Robinson