

Exhibit No.:
Issue(s): Resource Planning
Witness: Michael J. Abbott
Sponsoring Party: MoPSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: WR-2024-0104
Date Testimony Prepared: October 24, 2024

MISSOURI PUBLIC SERVICE COMMISSION
INDUSTRY ANALYSIS DIVISION
WATER, SEWER, GAS, AND STEAM DEPARTMENT

SURREBUTTAL TESTIMONY

OF

MICHAEL J. ABBOTT

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

CASE NO. WR-2024-0104

Jefferson City, Missouri
October 2024

Surrebuttal Testimony of
Michael J. Abbott

1 A. No. As described in my direct testimony drought resiliency is the ability of a
2 water entity to manage and even significantly reduce negative impacts caused by drought by
3 developing and implementing strategies, plans and actions. As clearly stated in Mr. Penna's
4 rebuttal testimony page 2, line 15 "...Liberty does not have a written plan in Missouri."

5 Q. Does Mr. Penna provide additional information regarding Liberty Water's
6 strategies, plan, and actions to manage and significantly reduce negative impacts caused
7 by drought?

8 A. No. On page 2, line 19 of his rebuttal testimony, Mr. Penna States that Liberty
9 Water will align with and work with the Department of Natural Resources ("DNR")
10 implementing the DNR Drought Response Plan. Liberty Water's alignment does not provide
11 any strategies, plans, or actions focused on managing and significantly reducing negative
12 impacts caused by drought. Rather, Liberty Water's five (5) phases establish that Liberty Water
13 will provide data to Drought Assessment Committee regarding well information, provide
14 drought related or conservation communications with customers, communicate the severity of
15 the drought and the need to conserve water with customers, and implement any restrictions
16 imposed by the state.

17 Q. Do you agree that Liberty Water can develop satisfactory drought resiliency?

18 A. Yes. As noted on page 4, lines 7 and 8 of his rebuttal testimony, Mr. Penna
19 states that Liberty Water does not disagree with my recommendations provided in my direct
20 testimony. Additionally, Liberty Water clearly states that they can file a drought resiliency plan
21 within one (1) year of the effective date of a Commission Order establishing new rates.

22 Q. Does this conclude your surrebuttal testimony?

23 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 MICHAEL J. ABBOTT

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL J. ABBOTT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Michael J. Abbott*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.



MICHAEL J. ABBOTT

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 22nd day of October 2024.

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



Notary Public