

Exhibit No.: _____
Issues: Rate Design/Class Cost of Service
Witness: Thomas Relford
Type of Exhibit: Surrebuttal 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

SURREBUTTAL TESTIMONY

OF

THOMAS RELFORD
ON BEHALF OF
THE CITY OF BOLIVAR

OCTOBER 24, 2024

1 **I. Introduction of Witness and Testimony**

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

3 A. My name is Thomas Relford. I am the City Administrator for the City of Bolivar. My
4 business address is PO Box 9, Bolivar, MO 65613.

5 **Q. Are you the same Thomas Relford who filed direct testimony in these cases on**
6 **September 10, 2024?**

7 A. Yes.

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

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

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

11 A. I am responding to Liberty's misrepresentation of some of the facts about the negotiations
12 for Liberty's purchase of Bolivar's water and sewer systems so that this Commission will
13 have a full and accurate record of evidence upon which to make its ruling in these cases.

14 **Q. Please summarize your testimony.**

15 A. In its response to the Office of Public Counsel's Data Request No. 0037 (attached hereto
16 as Schedule TR-8), Liberty states that it "is unaware of what assumptions, if any, may
17 have been relied upon" to arrive at the requirement in Section 6.12 of the Asset Purchase
18 Agreement (*See*, previously filed Schedule TR-6) that Bolivar raise its water and sewer
19 rates by 6.3% no later than January 2020. Although I was not the City Administrator at
20 the time of contract, it is my understanding that it was Liberty who unilaterally demanded
21 that Bolivar raise its water and sewer rates by 6.3% as a condition of Liberty's purchase
22 of the systems.

1 **Q. Does this conclude your pre-filed surrebuttal testimony in this case?**

2 A. Yes. However, I wish to preserve the right to provide additional pre-filed testimony or at
3 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 THOMAS RELFORD

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



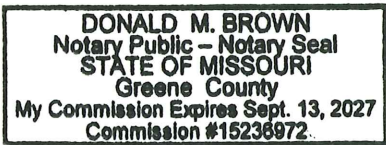
Thomas Relford

Subscribed and sworn to before me this 22nd day of October, 2024.



Notary Public

My commission expires: 09/13/2027





Liberty Utilities (Missouri Water) LLC. d.b.a. Liberty
Case No. WR-2024-0104
Office Public Counsel Data Request - 0037

Data Request Received: 2024-10-11

Response Date: 2024-10-18

Request No. 0037

Witness/Respondent: Cindy Wilson

Submitted by: Marc Poston, marc.poston@opc.mo.gov

REQUEST:

The Bolivar Asset Purchase Agreement, Section 6.12 requires the City of Bolivar to increase water and sewer rates by not less than 6.3% to be effective no later than January 2020. Please provide the basis for the 6.3% number, including all documents, calculations, and assumptions regarding the reason for the 6.3% number.

RESPONSE:

The referenced increases prior to Liberty's acquisition of the assets were designed to move the rates toward the cost of service.

Liberty does not have documents or calculations related to the 6.3% to produce and is unaware of what assumptions, if any, may have been relied upon, other than the assumption that Bolivar rates were less than its cost of service at that time.