

Exhibit No.: _____
Issues: Venice on the Lake and Plant
Maintenance
Witness: Bruce Robinson
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Liberty Utilities (Missouri
Water) LLC d/b/a Liberty
Case No.: WR-2024-0104
Date Testimony Prepared: October 2024

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

Surrebuttal Testimony

of

Bruce Robinson

on behalf of

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

October 24, 2024



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

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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 Missouri, 64802.

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

8 A. Yes.

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

11 A. I address certain rebuttal testimony statements made by Commission Staff (“Staff”)
12 witness Darron Williams concerning Venice on the Lake and plant maintenance.

13 **II. VENICE ON THE LAKE**

14 **Q. Staff witness Williams alleges that “it was known at the time of acquisition that**
15 **most of the distribution system needs replacing” and, thus he believes that**
16 **possibly taking five years to complete replacement of the distribution system will**
17 **create additional costs from pumping additional water lost to leaks and breaks,**
18 **among other things. Williams Reb., pp. 2-3. Do you believe a more aggressive**
19 **construction schedule is appropriate?**

20 A. As indicated in Liberty witness Tony Penna’s rebuttal testimony, Liberty has used a
21 measured and responsible approach to the repairs of the Venice on the Lake system.

1 The approach being taken by Liberty will be beneficial to the customers from both a
2 service reliability and affordability perspective.

3 Knowing the system had issues when it was acquired, the Company sought the
4 counsel of a reputable engineering firm (Olsson Engineering) to independently assess
5 the system status and to prioritize the system needs of the Venice on the Lake water
6 system. Olsson analyzed the system and prepared engineering documents in
7 accordance with a Missouri Department of Natural Resources (“DNR”) Owner
8 Supervised Program. Liberty plans to proceed in a prudent manner to replace the
9 pipeline in the time allocated by the DNR program. Liberty views the construction of
10 the new well, pump house and tank as the highest priority in the Venice on the Lake
11 system.

12 **Q. What is the status of that project?**

13 A. Liberty has completed all preconstruction work on the well site and, in accordance with
14 U.S. Fish and Wildlife’s directives, began clearing the property on October 15, 2024.
15 On October 11, 2024, Liberty awarded the well drilling contract for Venice on the Lake,
16 and work will begin upon completion of land clearing and preliminary grading.
17 Liberty’s engineering consultant, Olsson Engineering, has indicated that the pump
18 house designs will be complete before November 1, 2024, and Liberty will then start
19 the process of identifying the contractor for that phase. Work on the storage tank will
20 begin soon after.

21 **Q. Mr. Williams indicates that “Staff determined that severe leaks in the distribution**
22 **system were causing the storage tank to empty during routine evening system**
23 **demand.” Williams Reb., p. 3. Is there a reason you seem to have focused on the**
24 **capacity issues?**

1 A. Yes. As we have gotten more experience operating the system, we recognize that many
2 of the leaks that have impacted the supply have been on the customer side of the meter.
3 This is especially true in cold weather and in regard to some customer lines that are
4 largely exposed to the weather. Liberty has limited ability to address those leaks. Thus,
5 while we do have distribution line issues at Venice on the Lake and will continue to
6 replace distribution lines where that is needed, we believe that adding needed capacity
7 will more quickly address the issues being experienced by most customers.

8 **Q. What is the next step for distribution line replacement?**

9 A. The Company has committed to spend \$650,000 in the near term in Venice on the Lake
10 line replacement work, starting with the excavation of the distribution main line. We
11 expect this work to be supervised by Olsson Engineering.

12 **III. UTILITY PLANT MAINTENANCE**

13 **Q. Staff witness Williams suggests that Liberty should “prioritize regular**
14 **maintenance on assets and replace some critical equipment at the end of their**
15 **useful life, but before they fail; particularly if continued repairs to a piece of**
16 **equipment are becoming costly relative to replacement.” Williams Reb., p. 4. Does**
17 **Liberty agree that this approach to preventive maintenance is a good strategy?**

18 A. Yes.

19 **Q. Mr. Williams further suggests that Liberty “establish a Preventive Maintenance**
20 **Plan (“PM Plan”) for all water and sewer plants by December 31, 2025.” Williams**
21 **Reb., p. 5. How do you respond to this suggestion?**

22 A. Liberty agrees with Mr. Williams that preventative maintenance is a good practice to
23 ensure the most value (reliability and longevity) can be extracted from the installed

1 operating equipment. Liberty will establish a general PM Plan for water and for sewer
2 plans by December 31, 2025.

3 As part of the Customer First project, Liberty loaded the preventative
4 maintenance procedures (PM) for the plants into SAP. SAP will provide a reminder
5 notification for each PM prior to its scheduled performance to allow Operations
6 adequate time for resource planning. SAP will subsequently issue a work order to
7 Operations when it is time to perform the maintenance.

8 **Q. Does this conclude your surrebuttal testimony at this time?**

9 A. Yes.

VERIFICATION

I, Bruce Robinson under penalty of perjury, on this 24th day of October, 2024, declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Bruce Robinson