

Exhibit No.: \_\_\_\_\_  
Issues: Rate Design/Class Cost of Service  
Witness: Michael Methvin  
Type of Exhibit: Direct 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**

**CORRECTED**  
**DIRECT TESTIMONY**

**OF**

**MICHAEL METHVIN**  
**ON BEHALF OF**  
**THE CITY OF BOLIVAR**

**SEPTEMBER 10, 2024**

1                                   **I.       INTRODUCTION OF WITNESS AND TESTIMONY**

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

3   A.    My name is Michael Methvin. I am the Superintendent for Bolivar R-1 Schools. My  
4       business address is 524 West Jackson Street, Bolivar, Missouri.

5   **Q.    Please describe your professional background.**

6   A.    I began serving as Superintendent for Bolivar Schools in July 2024 after serving as an  
7       Executive Director of Schools for Springfield Public Schools.

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.    Have you previously testified before the Missouri Public Service Commission?**

11 A.    No.

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

13 A.    In these two cases, Liberty proposed to more than double its rates to Bolivar water  
14       customers, and to either reduce its rates to Bolivar sewer customers or pass along excess  
15       Bolivar sewer revenues to Liberty’s sewer customers in other service areas. Bolivar R-1  
16       Schools is now a Liberty water and sewer customer in Bolivar. Because Liberty’s  
17       statements in these two cases are significantly different from its representations and  
18       commitments to Bolivar R-1 Schools during the 2019-2022 time period that Liberty  
19       sought Bolivar R-1 Schools’ approval to buy Bolivar’s water and sewer systems, I offer  
20       my testimony so that this Commission will have a full and fair record of factual evidence  
21       upon which to ground the final order it enters in these cases.

22 **Q.    Please summarize your testimony.**

23 A.    In 2020, Bolivar R-1 Schools were told by Liberty through its website and in public

1 meetings – that sewer rates would increase by 38% if the City continued to operate the  
2 systems, but that Liberty wouldn't seek to raise its sewer rates until 2024, and then by no  
3 more than 19%. All information and discussion was at that time focused on sewer rates.  
4 Bolivar R-1 Schools then supported the sale of Bolivar's water and sewer systems to  
5 Liberty. Now, Liberty proposes to decrease our sewer rates, or share our excess sewer  
6 revenue with Liberty's other customers, while more than doubling our water rates. Such  
7 an increase in our water rates would be an unfair, unexpected and extraordinary expense  
8 which would force Bolivar R-1 Schools to curtail or eliminate some facilities and/or  
9 services. And, Bolivar R-1 Schools are concerned that Liberty intends to follow these  
10 two cases with another rate case seeking extraordinary increases in our sewer rates.

## 11 II. Liberty's Prior Representations to Bolivar R-1 Schools

12 **Q. Did Liberty make any statements or promises to Bolivar R-1 Schools that persuaded**  
13 **the school system to support the sale of Bolivar's water and sewer systems to**  
14 **Liberty?**

15 A. Liberty set up a website, and I understand that it is still operable, and the address is:  
16 <https://betterwaterbolivar.com> I have attached the print-out of that website's content as  
17 Schedule MM-1, and I understand that Liberty produced this print-out in response to Data  
18 Request 0005 of the Office of Public Counsel.

19 **Q. Did Liberty in its website make any statements about the water and sewer rates that**  
20 **the school system might expect if Bolivar's systems were kept by the City or instead**  
21 **sold to Liberty?**

22 A. I recall that we were told that the sewer system needed repairs, and that the City would  
23 have to increase sewer rates by 38%. The print-out of the website matches my

1 recollection of that statement, and also the statement that Liberty’s sewer rates would be  
2 less than what the City would have to charge because Liberty would spread the costs of  
3 repairing the sewer system across more customers.

4 **Q. Was the school system given any other information about the sale of Bolivar’s water  
5 and sewer systems to Liberty?**

6 A. Yes. There were public meetings held in early 2020 before the election. At those public  
7 meetings, Liberty gave a slideshow presentation. I have attached a print-out of that  
8 Liberty slideshow presentation as Schedule MM-2, and I understand this was produced by  
9 Liberty in response to Bolivar’s Data Requests BOL-11 and BOL-12.

10 **Q. Did Liberty in its slideshow presentation make any statements about the water and  
11 sewer rates that the school system might expect if Bolivar’s water and sewer systems  
12 were kept by the City or instead sold to Liberty?**

13 A. Yes, Liberty presented a table of the city engineers’ estimated costs for repairs to the  
14 City’s sewer systems which were predicted to raise Bolivar’s volumetric sewer rates so  
15 that monthly bills would increase anywhere from \$48 to \$376. In the alternative, Liberty  
16 promised to hold off on any rate increase until 2024 and said that it would then request a  
17 monthly increase in the range of \$8.22 to \$9.52, or 19%.

18 **Q. Did Bolivar R-1 Schools then support Bolivar’s sale of its water and sewer systems  
19 to Liberty?**

20 A. Yes.

21 **III. Liberty’s Requests Regarding Water and Sewer Rates Will Harm**

22 **Bolivar R-1 Schools**

23 **Q. Was the Bolivar R-1 School System surprised to learn that Liberty is in these two**

1           **cases proposing to more than double its water rates?**

2    A.    Yes, very surprised. Just a little over a month ago, Liberty sent its “Notice of Public  
3           Hearings in Liberty’s Water and Wastewater Rate Cases” along with that month’s bill.  
4           That Notice included a chart (which I’ve attached to my testimony as Schedule MM-3)  
5           that shows Bolivar’s water rates will more than double if Liberty gets what it is asking for  
6           in these two cases.

7    **Q.    If Liberty succeeds in more than doubling its Bolivar water rates, what will be the**  
8           **effect on the school system’s facilities and services?**

9    A.    The increase of rates would more than double the budget allocations for water usage,  
10           impacting the district’s ability to provide resources and staffing necessary for the  
11           operational capacity of the district.

12   **Q.    Does this conclude your pre-filed direct testimony in this case?**


13   A.    Yes. However, I wish to preserve the right to provide additional pre-filed testimony or at  
14           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 BOLIVAR R-1 SCHOOL DISTRICT**

Michael Methvin, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying direct 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.

  
\_\_\_\_\_  
Superintendent, Bolivar Schools

Subscribed and sworn to before me this 5<sup>th</sup> day of September, 2024.

  
\_\_\_\_\_  
Notary Public

My commission expires: 08-20-2026

