

## Exhibit No. 215

Staff – Exhibit 215  
Testimony of Daronn A. Williams  
Direct/Rebuttal  
File No. WR-2024-0320

*Exhibit No.:*  
*Issue(s):* *Revision of Maps  
and Legal  
Descriptions*  
*Witness:* *Daronn A. Williams*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Direct / Rebuttal  
Testimony*  
*Case No.:* *WR-2024-0320*  
*Date Testimony Prepared:* *December 6, 2024*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

**WATER, SEWER, GAS & STEAM DEPARTMENT**

**DIRECT / REBUTTAL TESTIMONY**

**OF**

**DARONN A. WILLIAMS**

**MISSOURI-AMERICAN WATER COMPANY**

**CASE NO. WR-2024-0320**

*Jefferson City, Missouri*  
*December 6, 2024*

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1 utility providers who may share a border, and for the Commission to effectively regulate  
2 provision of the utility service.

3 Q. Why do certain maps need to be revised?

4 A. For the most part, the maps in question are illegible, do not show a defined  
5 boundary area, lack pertinent roads and/or highways in or near the service area labeled large  
6 and clear enough to read, or have a heading title on the top of the page that does not describe  
7 the area but list the case number the tariff addition is associated with. Some of these hand-drawn  
8 maps may have been legible when first created, but they appear to have been scanned multiple  
9 times or with poor resolution equipment.

10 Q. Why do certain legal descriptions need to be revised?

11 A. For the most part, the legal descriptions in question:

- 12 • Are illegible,
- 13 • Include items that may change over time and items not easily available to  
14 the public (such as lot numbers, lot lines, parcel numbers, owner's names,  
15 subdivision lines, surveyor's record page numbers, plat book page  
16 numbers, etc.),
- 17 • Describe multiple areas when one contiguous area could be described, or
- 18 • Have a heading title on the top of the page that does not describe the area but  
19 list the case number the tariff addition is associated with.

20 Q. Which maps and legal descriptions need to be revised?

21 A. Staff only reviewed maps and legal descriptions in MAWC's water tariff,  
22 PSC MO No. 13, during this rate case and did not review maps and legal descriptions in the  
23 sewer tariff because the maps and legal descriptions in the sewer tariff were more recently

1 reviewed and revised by MAWC and Staff. Schedule DAW-d2 list all the maps and legal  
2 descriptions in the water tariff that need to be revised

3 Q. Does Staff have any other concerns with the tariff?

4 A. Yes, Staff has the following additional tariff concerns:

- 5 • The Mexico service area does not have a map or detailed legal description  
6 (see Sheet No. CA 9.1)
- 7 • The City of Brunswick and Vicinity does not have a map and legal description  
8 (see Sheet No. CA 10.1)
- 9 • The page numbers on the Table of Contents for the following areas need to be  
10 updated on Sheet No. CA TOC C:
  - 11 ○ Stonebridge Village's legal description
    - 12 ■ Needs to add Sheet No. CA 15.26
  - 13 ○ Saddlebrooke's map and legal description
    - 14 ■ Change Sheet No. CA 15.26 for the map to CA 15.27
    - 15 ■ Change Sheet No. CA 15.27 for the legal description to CA 15.28
  - 16 • Update the description of Hickory Hills to include "Temple Terrace" on Sheet  
17 No. CA TOC C for the map and legal description, just as it appears on the sheets  
18 for the map and legal description (as seen on Sheet Nos. CA 16.1-16.3)
  - 19 • As other maps and legal descriptions change or become consolidated,  
20 the corresponding sheet numbers may change, which may result in further  
21 changes to the Table of Contents.

22 Q. Why is it necessary to generate a map for service provided to a city?

1           A.     City limits can grow and shrink. If the service area description is simply the city  
2 limits, this would enable a company to increase or decrease its service area without applying  
3 for a certificate of convenience and necessity ("CCN"), and could bring it into legal conflict  
4 with existing providers. In many locations across the state there are customers that are annexed  
5 within city limits but are served by a private company or public water supply district. In other  
6 situations, a city may provide service outside city limits where no other provider is available.  
7 All of these variables make the use of the legal boundary of a city problematic. It is Staff's  
8 position that defined boundaries are the most reasonable approach.

9           Q.     Is MAWC aware that certain maps and legal descriptions in the water tariff need  
10 to be revised?

11          A.     Yes. Staff has been in communication with MAWC since the previous rate case  
12 on this issue. MAWC agreed at the time to file revisions. It is Staff's understanding that  
13 MAWC continues to agree that many of these tariff sheets need to be revised, but Staff requests  
14 the Commission order the submission of revised maps to ensure the change finally occurs.

15          Q.     What does Staff recommend MAWC do about these maps and legal descriptions  
16 in question?

17          A.     Staff recommends MAWC work with Water, Sewer, Gas and Steam Staff  
18 members to revise the maps and legal descriptions listed on Schedule DAW-d2. Once all of the  
19 map and legal descriptions have been reviewed and revised by Staff and MAWC, MAWC  
20 should then replace the necessary sheet numbers as part of the compliance tariff filing  
21 associated with this case. As a reminder, Staff is not requesting that MAWC change the  
22 footprints to these service areas unless a problem is discovered, but clarify these service areas  
23 so the public can clearly identify if they are customers of MAWC. In addition, if MAWC feels

1 it needs to make changes to the legal description or map that would change a service area  
2 footprint, Staff does not object if MAWC files a separate CCN case to make these changes.  
3 However, Staff would like to make as many revisions to the maps and legal descriptions in  
4 question as part of this rate case where the service area footprint is not changing.

5 Q. What does Staff recommend the Commission do about these concerns?

6 A. Staff recommends the Commission order MAWC to work with Water, Sewer,  
7 Gas and Steam Staff members to revise the maps and legal descriptions listed on  
8 Schedule DAW-d2 and file a tariff revision no later than December 31, 2025.

9 Q. Does this conclude your direct / rebuttal testimony?

10 A. Yes, it does.

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

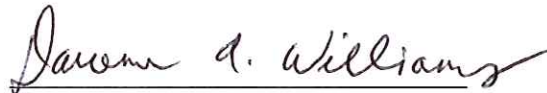
In the Matter of Missouri-American Water Company's     )  
Request for Authority to Implement a General Rate     )     Case No. WR-2024-0320  
Increase for Water and Sewer Service Provided in     )  
Missouri Service Areas     )

**AFFIDAVIT OF DARONN A. WILLIAMS**

STATE OF MISSOURI     )  
                                      )     ss.  
COUNTY OF COLE     )

**COMES NOW DARONN A. WILLIAMS** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Direct / Rebuttal Testimony of Daronn A. Williams*; and that the same is true and correct according to his best knowledge and belief.


Further the Affiant sayeth not.

  
**DARONN A. WILLIAMS**

**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 26<sup>th</sup> day of November 2024.



  
Notary Public



### **Daronn A. Williams**

As an Associate Engineer with the Water, Sewer and Steam Department of the Commission Staff, my core duties revolve around being the lead engineer for a variety of cases such as Application for Certificate, Merger, Sale, Transfer, Rate Case, Territorial Agreement, and more filed with the Commission from water and sewer utilities. I also hold a Drinking Water Distribution Level – 1, Drinking Water Treatment Level – D, and Wastewater Treatment Level – D Operations Certification from the Missouri Department of Natural Resources.

### **Educational Background and Work Experience**

I hold a Bachelor of Science Degree in Environmental Engineering from Missouri University of Science & Technology. Prior to starting at the Commission, in December 2018, I worked as an Environmental Engineer at the Missouri Department of Natural Resources for the Air Pollution Control Program, from January 2009 to November 2018.

### **Previous Testimony Before the Public Service Commission**

<b>Case Number</b>	<b>Company</b>	<b>Type of Testimony</b>	<b>Issue</b>
SA-2021-0017	Missouri American Water Company (MAWC)	Surrebuttal & Oral	General Info & Misc.
WR-2022-0303	MAWC	Rebuttal	Class Cost of Service/Rate Design
WR-2023-0006	Confluence Rivers	Rebuttal	Maintenance, Service Area Maps and Legal Descriptions
WR-2023-0344	The Raytown Water Co.	Direct, Rebuttal, Surrebuttal & Oral	Capital Improvements, Non-revenue water, AMI meters

<b>Case Number</b>	<b>Company</b>	<b>Type of Testimony</b>	<b>Issue</b>
WR-2024-0104	Liberty Water	Direct, Rebuttal & Surrebuttal	Prudency Review, Compliance Issues, Capital Improvement Plan, Water Loss, Revisions of Maps and Legal Descriptions, Site Specific System Upgrades and Status Reports, Water and Sewer Plant Maintenance, Annual Water Loss Report, and Non-Revenue Water Actions

List of Maps and Legal Descriptions That Need Revising From MAWC's Water Tariff

<b>Certificated Area Description with Sheet Number</b>
St. Louis Co. – Description CA 1.1
St. Louis Co. – City of Peerless Park (Map) CA 1.2
St. Louis Co. – City of Peerless Park (Legal Description) CA 1.3 – 1.5
St. Louis Co. – Line Certificate Granted in Case No. WA-2001-473 (Map) CA 1.6
St. Louis Co. – Line Certificate Granted in Case No. WA-2001-473 (Legal Description) CA 1.7
St. Louis/Jefferson Co. Certificate Granted in Case No. WA-2008-0125 (Map) CA 1.8
St. Louis/Jefferson Co. Certificate Granted in Case No. WA-2008-0125 (Legal Description) CA 1.9
St. Louis Co. – Pevely Farms Service Area (Legal Description) CA 1.10
St. Louis Co. – Pevely Farms Service Area (Legal Description continued) CA 1.11
St. Charles – Map CA 2.1
St. Charles – Weldon Springs Service Area (Legal Description) CA 2.2 – 2.4
St. Charles/St. Louis Line Certificate Granted in Case No. WA-96-353 (Map) CA 2.5
St. Charles/St. Louis Line Certificate Granted in Case No. WA-96-353 (Legal Description) CA 2.6
St. Charles – Certificate Granted in Case No. WA-97-45 (Map) CA 2.7
St. Charles – Certificate Granted in Case No. WA-97-45 – Area 1(Legal Description) CA 2.8
St. Charles – Certificate Granted in Case No. WA-97-45 – Area 2 (Legal Description) CA 2.9
St. Charles – Certificate Granted in Case No. WA-97-45 – Area 3 (Legal Description) CA 2.10
St. Charles – Certificate Granted in Case No. WA-2000-59 (Map) CA 2.11
St. Charles – Certificate Granted in Case No. WA-2000-59 (Legal Description)) CA 2.12
St. Charles – Certificate Granted in Case No. WA-2000-461 (Map) CA 2.13
St. Charles – Certificate Granted in Case No. WA-2000-461 (Legal Description) CA 2.14
St. Charles – Territorial Agreement Granted in Case No. WO-2001-441 (Map) CA 2.15 – 2.16B
St. Charles – Territorial Agreement Granted in Case No. WO-2001-441 (Legal Description) CA 2.17 – 2.24
Warren County - Service Area (Map) CA 2.25
Warren County - Service Area (Legal Description) CA 2.26 – 2.28
Jefferson City Service Area (Legal Description) CA 3.1
Jefferson City Service Area (Map) CA 3.2
Wardsville – Service Area (Legal Description) CA 3.3 - 3.4
Wardsville – Service Area (Map) CA 3.5
Platte County Water Service Area (Legal Description) CA 4.2 & 4.3

Warrensburg Service Area (Map) CA 5.2
Warrensburg Service Area (Legal Description) CA 5.3
Joplin Service Area CA (Legal Description) 6.1
Joplin Service Area Granted in Case No. WA-2000-405 (Map) CA 6.2
Joplin Service Area Granted in Case No. WA-2000-405 (Legal Description) CA 6.3
Joplin Service Area (Map) – Loma Linda Development CA 6.4
Joplin Service Area (Legal Description) – Loma Linda Development CA 6.5
St. Joseph Service Area CA (Legal Description) 7.1
St. Joseph Service Area Granted in Case No. WM-92-84 (Map) CA 7.2
St. Joseph Service Area Granted in Case No. WM-92-84 (Legal Description) CA 7.3-7.7
St. Joseph Service Area Granted in Case No. WA-97-46 (Map) CA 7.8
St. Joseph Service Area Granted in Case No. WA-97-46 (Legal Description) CA 7.9-7.10
St. Joseph Service Area Granted in Case No. WA-97-46 (Map) CA 7.11
St. Joseph Service Area Granted in Case No. WA-97-46 (Legal Description) CA 7.12-7.13
Mexico Service Area (Legal Description) CA 9.1
Brunswick Service Area (Legal Description) CA 10.1
Taney County Service Area Granted in Case No. WA-96-96 (Map) CA 11.1
Taney County Service Area Granted in Case No. WA-96-96 (Legal Description) CA 11.2
Taney County Service Area (Map) – Branson Canyon CA 11.3
Taney County Service Area (Legal Description) – Branson Canyon CA 11.4
Lincoln County Service Area Granted in Case No. WA-2015-0019 (Map) CA 12.1
Lincoln County Service Area Granted in Case No. WA-2015-0019 (Legal Description) CA 12.2
Jaxson Estates Service Area Granted in Case No. WA-2016-0054 (Map) CA 13.1
Lake Carmel Area (Map) CA 14.1
Lake Carmel Area (Legal Description) CA 14.2
Rankin Acres Service Area (Map) CA 15.1
Spring Valley Area (Map) CA 15.3
Lakewood Manor (Map) CA 15.5
Lakewood Manor (Legal Description) CA 15.6
Ozark Mountain Area (Map) CA 15.7
Ozark Mountain Area (Legal Description) CA 15.8-15.15
Lake Taneycomo Acres Area (Map) CA 15.16
Lake Taneycomo Acres Area (Legal Description) CA 15.17

Whitebranch Area (Map) CA 15.18
Whitebranch Area (Legal Description) CA 15.19
Maplewood Area (Map) CA 15.20
Maplewood Area (Legal Description) CA 15.21
Riverside Estates Area (Map) CA 15.22
Riverside Estates Area (Legal Description) CA 15.23
Stonebridge Village Area (Map) CA 15.24
Saddlebrooke Area (Map) CA 15.27
Saddlebrooke Area (Legal Description) CA 15.28
Tri-States Area (Map) CA 15.29
Tri-States Area (Legal Description) CA 15.30
Spokane Highlands (Map) CA 15.31
Spokane Highlands (Legal Description) CA 15.32
Hickory Hills & Temple Terrace Area (Map) CA 16.1-16.2
Woodland Manor Area (Map) CA 17.1
Lawson Service Area (Map) CA 18.1
Rogue Creek Service Area (Map) CA 19.1
Rogue Creek Service Area (Legal Description) CA 19.2-19.3
Stewartsville Service Area (Legal Description) CA 26.2
Irononton Service Area (Legal Description) CA 29.2-29.3