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Service Commission

## Exhibit No. 224

Staff – Exhibit 224  
Testimony of Jarrod J. Robertson  
Cross-Rebuttal/Surrebuttal  
File No. WR-2024-0320

*Exhibit No.:*  
*Issue(s):* *Normalized Residential  
Customer Usage &  
Declining Residential  
Customer Usage*  
*Witness:* *Jarrold J. Robertson*  
*Sponsoring Party:* *MoPSC Staff*  
*Type of Exhibit:* *Cross-Rebuttal/Surrebuttal  
Testimony*  
*Case No.:* *WR-2024-0320*  
*Date Testimony Prepared:* *January 10, 2025*

**MISSOURI PUBLIC SERVICE COMMISSION**

**INDUSTRY ANALYSIS DIVISION**

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

**CROSS-REBUTTAL/SURREBUTTAL TESTIMONY**

**OF**

**JARROD J. ROBERTSON**

**MISSOURI-AMERICAN WATER COMPANY**

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

*Jefferson City, Missouri*  
*January 2025*

**CROSS-REBUTTAL/SURREBUTTAL TESTIMONY**  
**OF**  
**JARROD J. ROBERTSON**  
**MISSOURI-AMERICAN WATER COMPANY**  
**CASE NO. WR-2024-0320**

Q. Please state your name and business address.

A. My name is Jarrod J. Robertson, and I am employed as Commission Staff (“Staff”) by the Missouri Public Service Commission (“Commission”), located at the Governor Office Building, Suite 500, 200 Madison Street, P.O. Box 306, Jefferson City, Missouri 65101.

Q. Are you the same Jarrod J. Robertson that filed Direct-Rebuttal Testimony in this case on December 6, 2024.

A. Yes, I am.

Q. What is the purpose of your Cross-Rebuttal/Surrebuttal testimony?

A. The purpose of this testimony is to address an error located within the workpaper that corresponds to my Direct-Rebuttal Testimony, “WR-2025-0320 Normalization-Declining Usage FILING,” and to provide associated revisions to the residential customer usage per day figures for District #2 (All Other), as well as revisions to data related to the residential customer usage trend comparison between Staff and Missouri American Water Company, Inc., LLC (“MAWC”).

Q. What is the error within the workpaper you would like to address?

A. Previously, in order to calculate average monthly customer counts on a per system basis, I had divided all annual totals within the “Avg Customer Count/Month Calendar Year” column by 12, but not all systems have 12 months of data for each annual/calendar year data point. So, within the first tab, “Usage & Cust. Count” of the workpaper, I adjusted all systems

Cross-Rebuttal/Surrebuttal Testimony of  
Jarrod J. Robertson

“Avg Customer Count/Month Calendar Year” column’s data to represent the correct monthly average for each annual data point, by dividing the annual/calendar year total by the correct number of months/data points.

Q. What are the results of this revision?

A. The results of this revision have been provided in Schedule JJR-crs1.

Q. As a result of this revision, are there any other items you would like to address?

A. Yes. As a result of revisions to the residential monthly customer counts, the data presented in the “Usage Trend Comparison” tab of Staff’s workpaper, “WR-2025-0320 Normalization-Declining Usage FILING” has changed, and those results can be viewed in the following table, Table A, which presents a comparison of residential customer usage between Staff and MAWC, on an annual residential customer usage volumetric scale:

<b>Table A</b>					
<b>Tariff District 1</b>					
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>
	Annually	Total Annual Decline in Usage	Units	Total Annual \$ (Column D/1000)	Total Annual \$ Per Customer
Staff 5yr Res. Avg Decline/Customer (Actuals)	-1,407	(1,407*319,003) = 448,837,221	448,837,221*7.7604	-\$3,483,156.37	-\$10.92
Co. Predicted 10yr Res. Avg Decline/Customer	-1,000	(1,000*322,271) = 322,271,000	322,271,000*7.7604	-\$2,500,951.87	-\$7.76
	-407		-	\$982,204.50	-\$3.16
<b>Tariff District 2</b>					
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>
	Annually	Total Annual Increase/Decline in Usage	Units	Total Annual \$ (Column D/1000)	Total Annual \$ Per Customer
Staff 5yr Res. Avg DECREASE/Customer (Actuals)	-431	(431*116,727) = 50,309,337	50,309,337*8.3781	-\$421,496.00	-\$3.23
Co. Predicted 10yr Res. Avg Decline/Customer	-600	(600*119,281) = 71,568,600	71,568,600*8.3781	-\$599,608.89	-\$5.03
	-169		-	\$178,112.89	-\$1.80

Q. What do the revised comparisons in Table A between Staff and MAWC’s calculations show?

A. There were no changes to Tariff District 1 data. The resulting calculations related to the amount of decline in residential water consumption on an annual scale, and the impact of each in dollars, was unchanged for District 1. See bullet points below for a summary of the data:

- Tariff District 1;
  - Utilizing its five (5) year average, Staff calculated an annual decrease of ~1,407 gallons on a per residential customer usage scale;
    - This decrease in annual residential customer usage equates to a decrease in annual revenues of ~\$3,483,156,369;
      - This decrease in annual revenues equates to \$10.92 less in revenue per customer annually.
  - Utilizing its ten (10) year linear regression analysis, MAWC calculated an annual decrease of ~1,000 gallons on a per residential customer usage scale;
    - This decrease in annual usage equates to a decrease in annual revenues of ~\$2,500,951,868;
      - This decrease in annual revenues equates to ~\$7.76 less in revenue per customer annually.
- Regarding Tariff District 1, the difference between Staff and MAWC on an annual dollar scale is ~\$982,204,501, and ~\$3.16 less per customer in annual revenue.

The resulting calculations and comparison related to the outlined revisions for District 2 are as follows:

- Tariff District 2;
  - Utilizing its five (5) year average, Staff calculated an annual decrease of ~431 gallons on a per residential customer usage scale;
    - This decrease in annual residential customer usage equates to a decrease in annual revenues of ~\$421,496;
      - This decrease in annual revenues equates to \$3.23 less in revenue per customer annually.
  - Utilizing its ten (10) year linear regression analysis, MAWC calculated an annual decrease of ~600 gallons on a per residential customer usage scale;
    - This decrease in annual residential customer usage equates to a decrease in annual revenues of ~\$599,608,887;
      - This decrease in annual revenues equates to \$5.03 less in revenue per customer annually.
- Regarding Tariff District 2, the difference between Staff and MAWC on an annual dollar scale is ~\$178,112, and ~\$1.80 per customer in annual revenue.

Q. Are there any other items you would like to address?

A. Yes. The revisions previously outlined create a change to the District 2 (“D2”) residential customer usage on a gallons per day basis presented in “Table II” from my direct-rebuttal testimony. Those corrections for D2 are in Table B below:

<u>D1</u>			<u>D2</u>	
	Per Day			Per Day
2023	207.0702		2023	154.6963
2022	206.2013		2022	154.9141
2021	200.9525		2021	152.4711
2020	211.3091		2020	155.5115
2019	197.9667		2019	144.5376

- D1 (unchanged)

- This data displays an increase per day per residential customer usage for Tariff District 1 for three (3) out of the four (4) possible data points from 2019 through 2023;
  - 2019 – 2020 = +13.34 gallons per day;
  - 2020 – 2021 = -10.35 gallons per day.
  - 2021 – 2022 = +5.24 gallons per day;
  - 2022 – 2023 = +0.88 gallons per day.

- D2

- This data displays an increase in per day residential customer usage for Tariff District 2 for two (2) out of the four (4) possible data points from 2019 through 2023;
  - 2019 – 2020 = +10.97 gallons per day;
  - 2020 – 2021 = -3.04 gallons per day;
  - 2021 – 2022 = +2.44 gallons per day;
  - 2022 – 2023 = -0.21 gallons per day.

Q. Does this conclude your Cross-Rebuttal/Surrebuttal testimony?

A. Yes, it does.

Missouri-American Water Company

Case No. WR-2024-0320

Residential Customer Usage Per Day

<u>Service Area</u>	<u>Usage Per Day</u>
Tariff District No. 1*	204.7 gal
Tariff District No. 2**	152.4261 gal

\*St. Louis County & Pevely Farm

\*\*All Other

**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     )  
Increase for Water and Sewer Service Provided in     )  
Missouri Service Areas     )

Case No. WR-2024-0320

**AFFIDAVIT OF JARROD J. ROBERTSON**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

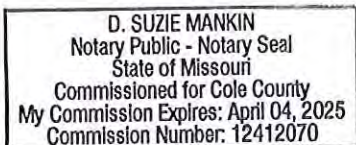
**COMES NOW JARROD J. ROBERTSON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Cross-Rebuttal / Surrebuttal Testimony of Jarrod J. Robertson*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JARROD J. ROBERTSON**

**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 9<sup>th</sup> day of January 2025.



  
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Notary Public