

Exhibit No. : 88
Witness : DENNIS HORN
Type of Exhibit : Surrebuttal Testimony
Party : CITY OF JEFFERSON
Case No. : WR-2003-0500
Issue : Fire Suppression

CITY OF JEFFERSON

Case No. WR-2003-0500

SURREBUTTAL TESTIMONY

OF

DENNIS HORN

FILED³
JAN 23 2004
Missouri Public
Service Commission

Jefferson City, Missouri
December 4, 2003

_____ exhibit No. 88
Date _____ Case No. WR-2003-0500
Reporter _____

1
2
3 **DIRECT TESTIMONY**
4

5 Q. WHAT IS YOUR NAME, TITLE AND BUSINESS ADDRESS?

6 A. My name is Dennis Horn and I am an Assistant Fire Chief for the Jefferson City Fire
7 Department. My office is located at Jefferson City Fire Station No. 1, 621 West High Street
8 (the corner of Bolivar and High), Jefferson City, Missouri.

9
10 Q. HOW LONG HAVE YOU BEEN A FIREMAN WITH THE JEFFERSON CITY FIRE
11 DEPARTMENT?

12 A. Thirty-one years.

13
14 Q. HOW LONG HAVE YOU SERVED AS AN ASSISTANT FIRE CHIEF?

15 A. Eight years.

16
17 Q. ON WHOSE BEHALF DO YOU APPEAR IN THIS PROCEEDING?

18 A. The City of Jefferson.

19
20 Q. WHAT ARE YOUR RESPONSIBILITIES AS ASSISTANT FIRE CHIEF?

21 A. I am in charge of one of the three fire crew shifts that are on duty for the Jefferson City Fire
22 Department. For the Department generally, I administer payroll, approve duty assignments,
23 manage emergency activity that occurs on any shift and am responsible for maintenance of
24 the major pieces of fire fighting equipment.

25
26 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

27 A. The purpose of my testimony is to respond to Company witness, Mr. Frank Kartmann's
28 Rebuttal testimony filed in this matter on or about November 10, 2003, particularly regarding
29 the loss of pressure experienced at our fire stations in September of this year.

30
31 Q. MR. KARTMANN TESTIFIES ON PAGE 7 THROUGH 8 OF HIS TESTIMONY THAT

1 THE COMPANY HAS NO RECORDS OR EMPLOYEE RECOLLECTIONS OF A
2 POWER LOSS OR WATER PRESSURE ISSUE ON SEPTEMBER 7, 2003? WERE YOU
3 ON DUTY ON THAT DATE?

4 A. Yes, I was. Because of Mr. Kartmann's testimony, Chief Rennick and I checked again with
5 each other respecting our recollection of the events on Sunday, September 7, 2003. I did not
6 prepare a written record of the events that evening, but it is the best of my recollection that
7 in the late evening on September 7, 2003, there was a loss of water pressure in the
8 Company's distribution system.

9
10 Q. WHAT HAPPENED WHILE YOU WERE ON DUTY THAT EVENING?

11 A. At about 9:00 p.m., I received a telephone call from Captain Steve Braun who reported that
12 there was a loss of water pressure at Station No. 4, located at 820 Ellis. From my post at
13 Station 1, I called the other stations to check on conditions there. Station No. 3 had water
14 at a trickle; Station Nos. 2 and 5 had normal pressure. I personally checked the pressure at
15 Station No. 1 and water was at a trickle. I came to the conclusion that the water company
16 may have lost power to its high pressure pumps.

17
18 Q. DID YOU TRY TO CONTACT THE WATER COMPANY AT THAT TIME?

19 A. Yes, I dialed the phone number for the water company that was published in the Jefferson
20 City phone directory. I received a recorded message with a variety of menu items but
21 eventually was connected with an operator who told me that she was located in western
22 Illinois. I told her about the absence of water pressure we were experiencing. She said that
23 she was not aware of the problem but would "make a note of it." I then asked if she had a
24 number I could dial to reach a local technician. I told her I needed to know the expected
25 length of the pressure problem. She said she would have someone get back with me. I gave
26 her a call back number and then we ended the call. I waited for about fifteen minutes for the
27 return call and thought it best to then contact Chief Rennick who I advised of the problem.

28

1 Q. WHILE YOU WAITED FOR THE CALL BACK FROM THE COMPANY
2 REPRESENTATIVE, WHAT DID YOU DO?

3 A. After I contacted Chief Rennick I drove to the water company plant on West Main and rang
4 the after hours door bell but no one responded. I then returned to Station No. 1 and called
5 the operator who was in western Illinois. I explained to her that I was not able to find anyone
6 at the plant. She said she would look into it and we ended our call.

7
8 Q. DID ANY ONE CALL YOU BACK AFTER THAT CALL?

9 A. Yes. About twenty minutes after my last call with the operator in western Illinois, someone
10 from the plant called me and said that a problem with the pumps had been solved.

11
12 Q. WERE YOU ABLE TO CONFIRM THIS?

13 A. I waited a few minutes after receiving that last call and then checked the water pressure at
14 Station No. 1. It was quickly improving. I then checked with the officers at Station Nos. 3
15 and 4. Water pressure was improving at those stations as well.

16
17 Q. HOW LONG HAD THE WATER PRESSURE BEEN LOW THAT EVENING?

18 A. I would estimate that the system experienced lower than adequate operating water pressure
19 for at least one (1) hour to one hour and fifteen minutes.

20
21 Q. MR. KARTMANN TESTIFIED THAT THE COMPANY'S RECORDS INDICATED A
22 LOSS OF ELECTRICAL POWER TO THE TREATMENT PLANT IN THE EVENING OF
23 SEPTEMBER 14, 2003. DO YOU KNOW IF ANY FIRE STATIONS EXPERIENCED
24 LOSS OF WATER PRESSURE THAT EVENING?

25 A. I was not on duty that evening and do not know if there was any loss of pressure. However,
26 I did not later receive any reports that pressure was below normal that evening.

27
28 Q. DO YOU HAVE ANY RECOMMENDATIONS FOR THE COMMISSION?

1 A. I join with Chief Rennick in his concern that the company's loss of operating water pressure
2 for a period of slightly more than an hour, for whatever reason, whether related to power
3 supplies or the operations of the pumps themselves, is a very serious matter from the point
4 of view of the Fire Department. Another concern is that on two consecutive weekends in
5 September of this year, the Company apparently experienced power interruptions or
6 mechanical problems with its system. The Commission should make the appropriate
7 inquiries of the Company to insure that there are reliable power supplies in place for back
8 up power, and that emergency back up pumps are in place if mechanical failures occur.

9
10 Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

11 A. Yes it does.