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Service Commission

### Exhibit No. 750

Issue: Rate Design
Witness: Brian C. Collins
Type of Exhibit: Surrebuttal Testimony
Sponsoring Parties: Triumph Foods, LLC

ring Parties: Triumph Foods, LLC
Case Nos.: WR-2022-0303 & SR-2022-0304

Date Testimony Prepared: February 8, 2023

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.

Case Nos. WR-2022-0303/ SR-2022-0304

Surrebuttal Testimony

**Brian C. Collins** 

On behalf of

**Triumph Foods, LLC** 

February 8, 2023



Project 11350.1

### BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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STATE OF MISSOURI ) SS COUNTY OF ST. LOUIS )

### Affidavit of Brian C. Collins

Brian C. Collins, being first duly sworn, on his oath states:

- 1. My name is Brian C. Collins. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by Triumph Foods, LLC in this proceeding on their behalf.
- 2. Attached hereto and made a part hereof for all purposes is my surrebuttal testimony which was prepared in written form for introduction into evidence in the Missouri Public Service Commission Case Nos. WR-2022-0303 and SR-2022-0304.
- 3. I hereby swear and affirm that the testimony is true and correct and that it shows the matters and things that it purports to show.

Brian C. Collins

Buan C. Collins

Subscribed and sworn to before me this 8<sup>th</sup> day of February, 2023.

SALLY D. WILHELMS
Notary Public · Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Aug. 5, 2024
Commission # 20078050

Sally D Wilhelma Notary Public

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### **Surrebuttal Testimony of Brian C. Collins**

1	Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	Α	Brian C. Collins. My business address is 16690 Swingley Ridge Road, Suite 140,
3		Chesterfield, MO 63017.
4	Q	ARE YOU THE SAME BRIAN C. COLLINS WHO PREVIOUSLY PRESENTED
5		TESTIMONY IN THIS PROCEEDING?
6	Α	Yes, I am.
7	Q	PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.
8	Α	This information was included in Schedule BCC-1 to my rebuttal testimony filed on
9		January 25, 2023.
10	Q	ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?
11	Α	My testimony is presented on behalf of Triumph Foods, LLC ("Triumph Foods").
12		Triumph Foods owns and operates a large pork-processing facility in St. Joseph,
13		Missouri and is the largest industrial consumer of water in Missouri-American Water
14		Company's ("MAWC" or "Company") service territory. Triumph Foods currently

employs approximately 2,500 people with 2,050 of those in production-related positions and 450 holding management and clerical positions.

Triumph Foods uses an extraordinary amount of water far in excess of typical industrial water consumers and operates under a special service contract with MAWC (described below) and thus has a vested interest in these proceedings.

#### Q WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY?

A This surrebuttal testimony will address the Missouri Public Service Commission Staff's and the Office of the Public Counsel's ("OPC") rebuttal testimonies on class cost of service and rate design in regard to the special contract Triumph Foods has with MAWC.

# Q HAVE YOU REVIEWED THE REBUTTAL TESTIMONIES OF STAFF AND OPC WITH RESPECT TO THE TRIUMPH FOODS SPECIAL CONTRACT?

Yes, I have reviewed the rebuttal testimonies. Based on that review, no party has disputed the continuation of the contract or the contract's rate methodology in rebuttal testimony.

#### 16 Q WHAT IS YOUR RECOMMENDATION?

Α

As a result of my review of the rebuttal testimonies of Staff and OPC, Triumph Foods' special contract should be continued as recommended in my rebuttal testimony. To the extent the Company's filed revenue requirement or class cost of service study results are adjusted, I would expect that the Triumph Foods rate proposed by the Company will be updated.

- 1 Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?
- 2 A Yes, it does.

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