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Data Center
Missouri Public
Service Commission

Exhibit No. 200

Staff – Exhibit 200
Jarrod Robertson Testimony
Rebuttal
File No. SM-2025-0067

Exhibit No.:
Issue(s): *Sponsor Staff's
Recommendation & Merger
Rationale*
Witness: *Jarrold J. Robertson*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *SM-2025-0067*
Date Testimony Prepared: *April 21, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, GAS & STEAM DEPARTMENT

REBUTTAL TESTIMONY

OF

JARROD J. ROBERTSON

**CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.,
and MISSOURI-AMERICAN WATER COMPANY**

CASE NO. SM-2025-0067

*Jefferson City, Missouri
April 2025*

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OF

JARROD J. ROBERTSON

CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.,

AND MISSOURI-AMERICAN WATER COMPANY

CASE NO. SM-2025-0067

Q. Please state your name and business address.

A. My name is Jarrod J. Robertson. My business address is 200 Madison Street, Jefferson City, Missouri 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission (“Commission”) as a Senior Research/Data Analyst with the Water, Sewer, Gas & Steam Department of the Industry Analysis Division, a member of Commission Staff (“Staff”). My credentials and a listing of cases in which I have filed testimony previously before the Commission are attached to this rebuttal testimony as Schedule JJR-r1.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to respond to the direct testimony of Confluence Rivers Utility Operating Company, Inc. (“Confluence”) and Missouri-American Water Company (“MAWC”), as needed, and to sponsor Staff’s recommendation in this acquisition case, filed in the Commission’s Electronic Filing Information System (“EFIS”) on December 30, 2024, in Case No. SM-2025-0067.

Q. Are there any new items presented in the direct testimony of Confluence and MAWC that were not presented in the application, that require a response at this time?

A. No.

1 Q. What is Staff's position on this application and the direct testimony filed
2 in this case?

3 A. Staff has determined that Confluence continues to demonstrate adequate
4 technical, managerial, and financial capability, as well as meet the Tartan Energy criteria:
5 1) the need for service; 2) the applicant's qualifications; 3) the applicant's financial ability;
6 4) the economic feasibility of the proposal; and, 5) promotion of the public interest.
7 Therefore, as detailed in the Staff Recommendation, attached to this rebuttal testimony as
8 Schedule JJR-r2, it is Staff's position that the acquisition of these utility systems by Confluence
9 from MAWC is not detrimental to the public interest.

10 Q. Does this conclude your rebuttal testimony?

11 A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)	
Confluence Rivers Utility Operating)	
Company, Inc., and Missouri-American)	<u>File No. SM-2025-0067</u>
Water Company for Authority for)	
Confluence Rivers Utility Operating)	
Company, Inc. to Acquire Certain Sewer)	
Assets of Missouri-American Water)	
Company in Callaway and Morgan)	
Counties, Missouri)	

AFFIDAVIT OF JARROD J. ROBERTSON

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

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 *Rebuttal Testimony of Jarrod J. Robertson*, and that the same is true and correct according to his best knowledge and belief.

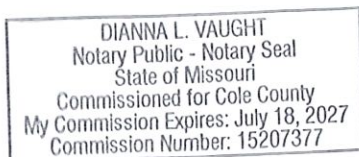
Further the Affiant sayeth not.




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 15th day of April 2025





Notary Public

Jarrold J. Robertson

As a Senior Research/Data Analyst, with the Water, Sewer and Steam Department of the Commission Staff Division my core duties revolve around being a Case Manager for small and large company rate Cases, requests for Certificate of Convenience and Necessity (“CCN”) related to acquisitions, mergers/sales, and/or transfer to non-profit, as well as tariff variances filed with the Commission. These duties include, but are not limited to: setting up the case Activities Timeline; authoring Customer Notice(s); coordinating meetings and correspondence between Staff, Office of the Public Counsel (“OPC”), and the utilities; disseminating information between Staff, OPC and the utilities; reviewing and if necessary, revising utilities’ tariff(s), as well as performing rate design and authoring testimony when appropriate. I also hold both a Water Distribution Level – 1 and Wastewater Treatment Level – D, Operations Certification, in order to perform site inspections, where applicable.

Educational Background and Work Experience

Prior to starting at the Commission, in July of 2015, I worked as an Environmental Specialist at the Missouri Department of Natural Resources (DNR) for both the Hazardous and Solid Waste Management Programs, from October 2008 – July 2015. I worked for the University of Missouri, Columbia as a Research Specialist from 1998 – October 2008, in the Agronomy, Animal Science and Biochemistry Departments, respectively.

While at DNR, as Project Manager in both the Hazardous and Solid Waste Management Programs, I analyzed data related to the release/spill of gasoline/petroleum, such as Light Non-Aqueous Phase Liquids (LNAPL) and Non-Aqueous Phase Liquids (NAPL), at Underground/Aboveground Storage Tanks and violations which occurred at Permitted Landfills and Infectious Waste Disposal. The data analysis involved volatile and non-volatile chemical concentration(s), their toxic; carcinogenic; flammability and other health hazards and the subsequent “desired” remedial levels of said chemicals. While with the Hazardous Waste Management Program, I also performed qualitative data analysis of concentration vs time and/or distance and point by point analysis using both the Mann-Kendall and Linear Regression statistical methods.

While at the University of Missouri, I analyzed data as it relates to the genetic and biological study/manipulation of various organisms: maize (corn); bovine and bacteria. I worked on the “Maize Project,” mapping the genetic structure of corn, using Simple Sequence Repeat (SSR) DNA Marker Technique; studied heat stress in bovine using microarray analysis; and in conjunction with the Department of Energy, created mutagenic strains of bacteria by deletion of a single gene or an operon (a cluster of genes) combined with cloning sequence(s) and amplification by way of a Poly Chain Reaction (PCR), to study the bacteria’s possible uses in the natural breakdown of Uranium, as well as a possible alternative energy source due to the bacteria’s ability to break down, and reduce sulfate into energy for mobility; in the Agronomy, Animal Science and Biochemistry Departments, respectively.

Previous Testimony Before the Public Service Commission

Case Number	Company	Type of Filing	Issue
WR-2024-0320	Missouri American Water, Inc.	Direct-Rebuttal & Cross-Rebuttal, Surrebuttal	Normalized & Declining Usage
WR-2024-0104	Liberty Water Company, Inc.	Direct & Rebuttal	Normalized Usage
WR-2022-0303	Missouri American Water, Inc.	Direct, Rebuttal & Surrebuttal	Normalized & Declining Usage
WM-2022-0186	Foxfire Utility Company & Ozark Clean Water Company	Rebuttal Testimony	Merger Rationale
SA-2021-0017	Missouri American Water Company, Inc.	Surrebuttal & Live Testimony	General Info & Misc.
WR-2020-0344	Missouri American Water Company, Inc.	Direct, Rebuttal & Surrebuttal	Normalized, Declining Usage & Covid
WR-2017-0343	Gascony Water Company, Inc.	Rebuttal, Surrebuttal, & Live Testimony	Rate Design
WR-2017-0285	Missouri American Water Company, Inc.	Direct, Rebuttal & Surrebuttal	Normalized & Declining Usage
WR-2016-0064	Hillcrest Utility Operating Company, Inc.	Direct, Rebuttal & Live Testimony	Rate Design