

Exhibit No. 138

Exhibit No.:
Issue(s): *Class Cost of Service/
Rate Design*
Witness: *Keri Roth*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *WR-2022-0303*
Date Testimony Prepared: *February 8, 2023*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, & STEAM DEPARTMENT

SURREBUTTAL TESTIMONY

OF

KERI ROTH

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WR-2022-0303

Jefferson City, Missouri
February 2023

1
2
3
4
5
6
7
8

**TABLE OF CONTENTS OF
SURREBUTTAL TESTIMONY OF
KERI ROTH
MISSOURI-AMERICAN WATER COMPANY
CASE NO. WR-2022-0303**

EXECUTIVE SUMMARY1
RESPONSE TO MIEC WITNESS JESSICA A. YORK.....2
RESPONSE TO MAWC WITNESS WESLEY E. SELINGER.....2

1 **RESPONSE TO MIEC WITNESS JESSICA A. YORK**

2 Q. Ms. York identified in her rebuttal testimony an error within Staff's Factor 4 in
3 its CCOS.¹ Did Staff correct this error in its rebuttal testimony?

4 A. Yes. In my direct testimony, I stated that an adjustment was included in Staff's
5 CCOS for transmission and distribution mains.² However, the calculation was erroneously not
6 included in Factor 4. The error was corrected in my rebuttal testimony.³

7 Q. Ms. York stated in her rebuttal testimony that Staff excluded contract customers
8 in its CCOS studies.⁴ Is this true?

9 A. No. Staff has included special contract customers in its CCOS studies.
10 The special contracts for the two industrial customers are embedded in the industrial customer
11 revenues, and the special contracts for the three sale for resale customers are embedded in the
12 sale for resale customer revenues in the CCOS studies.

13 **RESPONSE TO MAWC WITNESS WESLEY E. SELINGER**

14 Q. Mr. Selinger stated in his January 25, 2023, rebuttal testimony that it was not
15 clear in Staff's CCOS workpapers where Staff included an adjustment for transmission and
16 distribution mains.⁵ Has Staff corrected this error?

17 A. Yes. As mentioned above, the error was corrected in my rebuttal testimony.

18 Q. Mr. Selinger stated in his January 25, 2023, rebuttal testimony that MAWC does
19 not meter public fire; therefore, annualized gallons are estimated.⁶ However, MAWC does have

¹ *Rebuttal Testimony of Jessica A. York*, WR-2022-0303. P. 3:19-20.

² *Direct Testimony of Keri Roth*, WR-2022-0303. P. 8:20-23, P.9:1.3.

³ *Rebuttal Testimony of Keri Roth*, WR-2022-0303. P. 2:6-9.

⁴ *Rebuttal Testimony of Jessica A. York*, WR-2022-0303. P. 6:11-12

⁵ *Rebuttal Testimony of Wesley E. Selinger*, WR-2022-0303. P. 4:16.

⁶ *Rebuttal Testimony of Wesley E. Selinger*, WR-2022-0303. P. 5:2-3.

Surrebuttal Testimony of
Keri Roth

1 annualized usage data for private fire in its CCOS studies on the Usage Statistics tabs.⁷ Is Staff
2 concerned about MAWC estimating public fire information?

3 A. Yes. MAWC's CCOS studies do include total usage for private fire on the
4 Usage Statistics tabs; however, total estimated usage is not included for public fire on the Usage
5 Statistics tabs. It does not appear that estimated gallons have been specifically identified for
6 public fire. Staff proposes MAWC develop a way to show the breakdown of public fire gallons
7 and private fire gallons in its CCOS studies.

8 Q. Does this conclude your surrebuttal testimony?

9 A. Yes it does.

⁷ *Rebuttal Testimony of Wesley E. Selinger*, WR-2022-0303. P. 5:3-5.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water)
Company's Request for Authority to) Case No. WR-2022-0303
Implement General Rate Increase for Water)
and Sewer Service Provided in Missouri)
Service Areas)

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KERI ROTH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Keri Roth*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.



KERI ROTH

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 6th day of February 2023.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public