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Exhibit No. 138

Staff – Exhibit 138 Keri Roth Surrebuttal Testimony File No. WR-2022-0303

Exhibit No.: Issue(s): Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared: February 8, 2023

Class Cost of Service/ Rate Design Keri Roth MoPSC Staff Surrebuttal Testimony WR-2022-0303

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

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1		SURREBUTTAL TESTIMONY OF		
2		KERI ROTH		
3		MISSOURI-AMERICAN WATER COMPANY		
4		CASE NO. WR-2022-0303		
5	Q.	Please state your name and business address.		
6	А.	My name is Keri Roth and my business address is 200 Madison Street, P.O. Box		
7	360, Jefferson City, Missouri 65102.			
8	Q.	By whom are you employed and in what capacity?		
9	А.	I am employed by the Missouri Public Service Commission ("Commission") as		
10	a Senior Research/Data Analyst in the Water, Sewer, & Steam Department, Industry Analysis			
11	Division.			
12	Q.	Are you the same Keri Roth who previously filed direct testimony on		
13	December 16, 2022, and rebuttal testimony on January 25, 2023, in this case?			
14	А.	Yes, I am.		
15	EXECUTIV	E SUMMARY		
16	Q.	What is the purpose of your surrebuttal testimony in this case?		
17	А.	The purpose of my surrebuttal testimony is to respond to the rebuttal testimony		
18	of Missouri Industrial Energy Consumers ("MIEC") witness Jessica A. York regarding Staff's			
19	Factor 4 adjustment in the Staff Class Cost of Service Study ("CCOS") and the location of the			
20	special contracts in Staff's CCOS. I will also respond to Missouri-American Water Company			
21	("MAWC") witness Wesley E. Selinger regarding Staff's Factor 4 adjustment in its CCOS and			
22	public fire and private fire annual usage data.			

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.			

Rebuttal Testimony of Jessica A. York, WR-2022-0303. P. 3:19-20.
Direct Testimony of Keri Roth, WR-2022-0303. P. 8:20-23, P.9:1.3.
Rebuttal Testimony of Keri Roth, WR-2022-0303. P. 2:6-9.
Rebuttal Testimony of Jessica A. York, WR-2022-0303. P. 6:11-12
Rebuttal Testimony of Wesley E. Selinger, WR-2022-0303. P. 4:16.
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 ap	pear that estimated gallons have been specifically identified for	
6	public fire. Staff proposes MA	AWC develop a way to show the breakdown of public fire gallons	
7	and private fire gallons in its (CCOS studies.	
8	Q. Does this conc	lude 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 Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas

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SS.

Case No. WR-2022-0303

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI	
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.

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.

iziellankin

Notary Public

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