

Exhibit No.: 106
Issue(s): *Customer Applications*
Witness: *Mark Kiesling*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Rebuttal Testimony*
Case No.: *WR-2017-0343*
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MISSOURI PUBLIC SERVICE COMMISSION
COMMISSION STAFF DIVISION
WATER AND SEWER DEPARTMENT

FILED

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Missouri Public
Service Commission

REBUTTAL TESTIMONY

OF

MARK KIESLING

GASCONY WATER COMPANY, INC.

CASE NO. WR-2017-0343

Jefferson City, Missouri
January 2018

Staff Exhibit No. 106
Date 3/19/18 Reporter ML
File No. WR-2017-0343

Rebuttal Testimony of
Mark Kiesling

1 using an application for all new customers within thirty (30) days after the effective date of
2 the Commission order that resolves Case No. WR-2017-0343. My testimony will provide the
3 Commission with considerations to evaluate why this recommendation and time frame are
4 appropriate.

5 Q. What is Staff's recommendation regarding customer applications?

6 A. Staff's recommendation is:

7 Ensure all new customers complete an application for
8 service per the Company's tariff. This requirement
9 should be completed within thirty (30) days of the
10 effective date of the Commission order that resolves
11 Case No. WR-2017-0343.

12 Q. What specifically is the Company's disagreement with Staff's
13 recommendation?

14 A. Specifically Mr. Russo's testimony on page 18, lines 7 through 18 states:

15 The Company disagrees with the thirty-day completion
16 requirement recommended by CMAU because it is
17 doubtful whether or not the Company will have any new
18 customers in this time period.

19 Q. Why does the Company believe it cannot complete this recommendation?

20 A. According to Mr. Russo's testimony, the Company cannot agree with this
21 recommendation knowing it is extremely unlikely that the Company will acquire any new
22 customers within this time period. The Company cannot knowingly put itself in the position
23 of agreeing to something that results in the Company violating a Commission order.

24 Q. Does it appear that the Company understands Staff's recommendation?

25 A. No

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1 Q. Please explain.

2 A. As Staff understands the Company's testimony, the Company seems to be
3 implying that Staff is requiring the Company to acquire new customers within 30 days of the
4 Report and Order. Staff is not making that recommendation. Staff is simply recommending
5 that the Company utilize its existing customer application within 30 days of the Report and
6 Order for any future new customers that want to take service from the Company.

7 Q. What is the purpose of a customer application?

8 A. An application serves as the documentation and record that an applicant has
9 requested service, provides important information such as customer contact information, and
10 identifies the party responsible for payment.

11 Q. Does the Company agree with the recommendations that Staff made in regards
12 to using a customer application?

13 A. Yes. In Mr. Russo's testimony specifically page 17, line 18 and line 19 states:
14 The Company agrees that all new customers need to
15 complete an application for service.

16 Q. Is a customer application required in the Company's Tariff?

17 A. Yes. Per the Company Tariff on sheet 14, Rule 4 (a) states:
18 A written application for service, signed by the
19 Applicant, stating the type of service required and
20 accompanied by any other pertinent information, will be
21 required from each Applicant before service is provided
22 or continued to any Unit. Staff's recommendation is in
23 line with what is currently in the Company's currently
24 effective tariff.

25 Q. Does this conclude your testimony?

26 A. Yes.

