

Exhibit No.
Issues: Tariff, Company Operations,
Connection Charges, STEP Installations,
Customer Deposits, Rate Case Expense
Witness: Mark E. Geisinger
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Central Rivers
Case No. SR-2014-0247

Missouri Public Service Commission

Supplemental Direct and Rebuttal Testimony

of

Mark E. Geisinger

On Behalf of

Central Rivers Wastewater Utility, Inc.

MARK E. GEISINGER
SUPPLEMENTAL DIRECT AND REBUTTAL TESTIMONY

AFFIDAVIT

STATE OF KANSAS)
)
COUNTY OF JOHNSON) SS

I, Mark E. Geisinger, state that I am the President of Central Rivers Wastewater Utility, Inc. and, that the answers to the questions posed in the attached Supplemental Direct and Rebuttal Testimony are true to the best of my knowledge, information and belief.

Mark E. Geisinger

Subscribed and sworn to before me this 5 day of December, 2014.

Demeshia R. Wright
Notary Public

My Commission Expires:

SEPTEMBER 26, 2017
(SEAL)

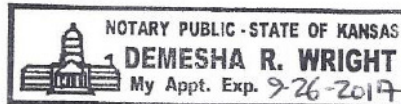


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MARK E. GEISINGER
SUPPLEMENTAL DIRECT AND REBUTTAL TESTIMONY

SUPPLEMENTAL DIRECT AND
REBUTTAL TESTIMONY
OF
MARK E. GEISINGER
CENTRAL RIVERS WASTEWATER UTILITY, INC.

WITNESS INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Mark E. Geisinger. My business address is 10040 Rock Falls Road,
Orrick, Missouri 64077.

**Q. ARE YOU THE SAME MARK E. GEISINGER THAT PREVIOUSLY FILED
DIRECT TESTIMONY IN THIS CASE ON BEHALF OF CENTRAL RIVERS
WASTEWATER UTILITY, INC. (CENTRAL RIVERS)?**

A. Yes, I am.

BACKGROUND

**Q. ON OCTOBER 7, 2014, THE STAFF OF THE PUBLIC SERVICE COMMISSION
FILED A PARTIAL DISPOSITION AGREEMENT. AT THE TIME YOU FILED
YOUR DIRECT TESTIMONY, WAS IT YOUR UNDERSTANDING THAT THE
STAFF WOULD FILE DIRECT TESTIMONY IN SUPPORT OF THAT PARTIAL
DISPOSITION AGREEMENT?**

A. Yes.

1 **Q. WHEN DID YOU FIND OUT THAT STAFF WOULD NOT BE SUPPORTING**
2 **THE PARTIAL DISPOSITION AGREEMENT?**

3 A. When I read Staff's direct testimony.
4

5 **Q. IN YOUR DIRECT TESTIMONY, YOU INDICATED THAT CENTRAL RIVERS**
6 **HAS APPROXIMATELY 280 CUSTOMERS. ARE ALL OF THOSE**
7 **"CUSTOMERS" CURRENTLY TAKING SERVICES?**

8 A. No. The 280 count includes those customers that pay "empty lot fees." As of
9 March 31, 2014, Central Rivers had approximately 241 customers actively taking
10 service.
11

12 **PURPOSE**

13 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT AND**
14 **REBUTTAL TESTIMONY?**

15 A. I will provide additional information in support of Central Rivers' rate request and
16 will respond to certain aspects of the Direct Testimony of James A. Merciel, Jr.
17 and Direct Testimony of Matthew R. Young, primarily in regard to their
18 allegations as to what information exists or does not exist and what was or was
19 not provided to Staff.
20

21 **Q. WILL OTHER TESTIMONY BE FILED ON BEHALF OF CENTRAL RIVERS?**

22 A. Yes. Dale Johansen will also file Supplemental Direct and Rebuttal Testimony in
23 support of Central Rivers' rate increase request.

TARIFF

Q. WHEN DID CENTRAL RIVERS' CURRENT SEWER TARIFF BECOME EFFECTIVE?

A. August 30, 1999.

Q. HAVE THERE BEEN ANY UPDATES TO THAT TARIFF?

A. There have been several, primarily to include additional service areas after various certificate of convenience and necessity cases.

Q. DO YOU BELIEVE THE TARIFF NEEDS MORE SUBSTANTIAL CHANGES?

A. Yes. My son, Luke, and I started in the fall of 2012, a process to review and identify necessary changes that could be presented to the Commission, in an attempt to revise the tariff.

Q. WHAT DID YOU FIND DURING THAT REVIEW?

A. While going through the current tariff we found several items places in the tariff where language seemed to be contradictory. These contradictions, along with several updates deemed to be necessary as result a result of the experience gained after operating this Company for the last 15 years, made the identified revisions important to the operations of the Company.

Q. DID YOU DISCUSS THESE REVISIONS WITH THE COMMISSION STAFF?

1 A. Yes. We worked through several revisions to the tariff with the Commission
2 Staff, beginning in late 2012/early 2013. At the conclusion of those talks,
3 members of the Staff advised us that a rate case would need to be completed
4 before the new tariff could take effect. Based upon that guidance, we got our
5 files together and then initiated this small company rate case in March of 2014.

6
7 **Q. IS REVISING THE TARIFF STILL ONE OF YOUR GOALS?**

8 A. Yes. However, we were unable to reach complete agreement with Staff during
9 the discussions leading up to the execution of the Partial Disposition Agreement.
10 We will need to renew those discussions at the appropriate time.

11
12 **COMPANY OPERATIONS AND PROVISION OF DOCUMENTS**

13 **Q. DOES CENTRAL RIVERS HAVE ANY EMPLOYEES?**

14 A. No.
15

16 **Q. HOW DOES CENTRAL RIVERS PROVIDE SERVICES?**

17 A. As described in my Direct Testimony, Central Rivers contracts with Construction
18 Services & Management, LLC (Construction Services), which I also own. Copies
19 of the contracts were provided with my Direct Testimony (Dir., Sch. MEG-2).
20 Construction Services has six employees and owns or leases equipment worth
21 approximately \$400,000.00.
22

1 **Q. DOES CONSTRUCTION SERVICES PERFORM WORK FOR CUSTOMERS**
2 **OTHER THAN CENTRAL RIVERS?**

3 A. Yes. Construction Services installs underground utilities for various customers,
4 including residential grinder pumps and STEP systems. It also performs service
5 work for wastewater and water facilities and grinder pumps and constructs
6 commercial and residential projects from planning stages to finished homes and
7 business facilities.

8
9 **Q. STAFF WITNESS MATTHEW YOUNG ALLEGES THAT CONSTRUCTION**
10 **SERVICES DECIDED TO “WITHHOLD INFORMATION SUPPORTING THE**
11 **ACTUAL COSTS OF UTILITY BUSINESS” (YOUNG DIR., P.4, LN. 22-23) AND**
12 **THAT CONSTRUCTION SERVICES “REFUSED TO PROVIDE SUFFICIENT**
13 **RECORDS NECESSARY TO JUSTIFY THAT THE UTILITY’S COSTS FROM**
14 **THE CONTRACT EFFECTIVE JANUARY 1, 2014 ARE REASONABLE AND**
15 **PRUDENT” (YOUNG DIR., P. 5, LN. 6-8). DO YOU AGREE?**

16 A. No.
17

18 **Q. DID CENTRAL RIVERS PROVIDE DOCUMENTS IDENTIFYING THE**
19 **SERVICES PERFORMED BY CONSTRUCTION SERVICES?**

20 A. Yes. Attached as **Schedule MEG-1** are copies of the invoices received by
21 Central Rivers from Construction Services during the period from January 1,
22 2013, through March 31, 2014, concerning service calls. Attached as **Schedule**
23 **MEG-2** are copies of the invoices received by Central Rivers from Construction

Services during the period from January 1, 2013, through March 31, 2014,
concerning the non-service call work performed for the systems.

Q. HAVE THESE INVOICES PREVIOUSLY BEEN PROVIDED TO STAFF?

A. Yes, they have.

Q. WHAT DO THE SERVICE CALL INVOICES IDENTIFY?

A. The service call invoices are issued contemporaneously with the performance of
the subject work and identify the following information:

1. Date the invoice is issued;
2. To which of the seven Central Rivers systems the work pertains;
3. The address to which a service call was made and the cause of the
trouble;
4. A break out of labor and material charges; and,
5. An explanation why additional hours were required (for example, invoice
for "Private Gar", 2/5/2014 – "2 men 4 hours each Tem[erature] -4 (10" of
snow)").

Q. WHAT DO THE NON-SERVICE CALL INVOICES IDENTIFY?

A. The non-service call invoices are issued on a monthly basis with the performance
of the subject work and identify the following information:

1. Date the invoice is issued;
2. To which of the seven Central Rivers systems the work pertains;

1 3. The task for which the charge is being made; and,

2 4. The amount of the charge.

3
4 **Q. DO THE INVOICES SHOW HOURS FOR EACH TASK?**

5 A. No.

6
7 **Q. WHY NOT?**

8 A. The contract calls for a fixed fee for many of the services. For example, the
9 following tasks have been completed numerous times over the years. Based On
10 this experience we have set an amount within the contract that corresponds with
11 the time it takes to accomplish said task.

12 - Monthly maintenance of sewer plants (which includes- A weekly visit to
13 the facility, checking and cleaning filters as needed, checking control panels and
14 alarms, monitoring and drawing water samples from effluent discharge, delivery
15 of samples to lab and sending required reports to DNR.)

16 - Yearly cleaning and inspection of the customers' collection equipment
17 (which includes Inspection of electrical control panel for proper operation and
18 alarm, Tank lid for good seal, remove filter basin and pump, clean and check for
19 solids level in tank, inspect all electrical and effluent connections in the tank);

20 - Monthly mowing of sewer plants and weed removal from filter beds (of
21 which there are seven);

- 1 - Clerical Duties (sending statements and invoicing, receiving payments,
2 deposits, receiving and paying bills, answering customer correspondents,
3 completing and mailing DNR reports , etc.);
- 4 - Monthly Management Tasks (such as weekly meetings with office staff
5 and operators reviewing Maintenance needs, Customer correspondence, DNR
6 required testing and reports, and all Banking correspondence);
- 7 - Quarterly Cleanings (which include inspection of Re circulating tanks and
8 all electrical connections, removal of the filter basins and pumps for cleaning and
9 inspection, inspection and cleaning of piping in sand filters, inspection and
10 cleaning of piping to effluent discharge); and,
- 11 - Additional monthly services required for the Private Gardens and Wilmar
12 systems (which involves guidelines designated by DNR for systems operated
13 above 200 P.E. this requires daily visits for monitoring).

14

15 **Q. PLEASE DESCRIBE HOW THE INVOICES ARE DEVELOPED BY**
16 **CONSTRUCTION SERVICES.**

17 A. As can be seen from the above, many of the charges are monthly or quarterly.
18 Thus, those charges are billed as called for by the contract after services are
19 rendered. Bill Geisinger (my father) oversees this process and executes the
20 billing once services have been completed.

21

22 **Q. HOW IS IT DETERMINED WHAT WORK WILL BE PERFORMED ON EACH**
23 **SYSTEM?**

1 A. We maintain Operator Compliance Charts for each of the seven sewer systems.
2 These charts identify many of the tasks that must be performed, to include the
3 appropriate interval for those tasks. Attached as **Schedule MEG-3** is a copy of
4 those Operator Compliance Charts.

5
6 **Q. WHAT IS THE CONTRACT CHARGE FOR SERVICE CALLS?**

7 A. Service calls are billed at a rate of \$150 for the first hour and \$60 for each
8 additional hour.

9
10 **Q. WHY IS THERE A DIFFERENT RATE FOR THE FIRST HOUR?**

11 A. As described in my Direct Testimony, Central Rivers owns and operates seven
12 separate wastewater systems. These systems are spread over three counties
13 and are separated by approximately 33 miles from north to south and 35 miles
14 from east to west. Thus, the time and vehicle use to travel to the customer must
15 be considered .

16
17 **Q. HOW ARE THESE SERVICE CALLS MANAGED?**

18 A. When a customer call comes in, Bill Geisinger (my father) notes the call in his log
19 book. He then dispatches someone to make the service call. At the conclusion
20 of the service call, the responding personnel call my father to describe the action
21 taken, whether the call took more or less than an hour, and what materials, if
22 any, were used. Those service calls are billed to Central Rivers. Attached as

1 **Schedule MEG-4** are copies of the pages of the log book for the period January
2 1, 2013, through March 31, 2014.

3
4 **Q. WAS THIS LOG BOOK PREVIOUSLY SHOWN TO STAFF PERSONNEL?**

5 A. Yes, it was.

6
7 **Q. STAFF WITNESS YOUNG USED THE WORDS “REFUSE” AND**
8 **“WITHHOLD.” IS THIS AN APPROPRIATE CHARACTERIZATION OF HOW**
9 **YOU REACTED TO STAFF REQUESTS FOR INFORMATION?**

10 A. No. Just because the Staff asks for certain documents, does not mean those
11 documents exist. A good example is the process described above. Central
12 Rivers (and Construction Services) have been asked for (and been unable to
13 provide) “timecards” associated with the work performed by Construction
14 Services employees. No “timecards” exist. There is no “refusal” to provide
15 timecards. I believe the process used by Construction Services to record the
16 work performed is effective and accurately reflects the work performed for
17 Central Rivers. However, Construction Services has no timecards. Likewise,
18 there are no “work orders” associated with these tasks. The work performed is
19 contemporaneously reported to the office and then an invoice is created to reflect
20 that work.

21
22 **Q. WHAT CONSTRUCTION SERVICES PERSONNEL PERFORM WORK FOR**
23 **CENTRAL RIVERS ON A NORMAL, ON-GOING BASIS?**

1 A. Outside of rate case related tasks, the following Construction Services personnel
2 perform work for Central Rivers: Mark Geisinger (A class operator); Bill
3 Geisinger; Isaac Geisinger (C class operator); Dalton Bridges; Wanda Gillum;
4 and, Herschel Gray.

5
6 **Q. DOES CONSTRUCTION SERVICES MAINTAIN TIMECARDS OR TIME**
7 **RECORDS FOR ANY OF THESE PERSONS?**

8 A. It does not, with one exception. In those few instances where Construction
9 Services works on a time and material contract, it will turn in time records for that
10 specific job as required by the contract. As discussed above, records of utility
11 service calls are kept by recording in the log book or on emergency maintenance
12 on sewer plants or main breaks and is reported to office for billing.

13
14 **Q. HOW ARE CONSTRUCTION SERVICES EMPLOYEES PAID?**

15 A. The non-family employees are paid a salary. It is assumed that some days they
16 will work more than 8 hours, some days they will work less than 8 hours, and in
17 the end it will generally balance out.

18
19 **Q. HOW DO THE FAMILY EMPLOYEES GET PAID?**

20 A. If Construction Services has money to pay us, we get paid. If Construction
21 Services does not have money to pay us, we do not get paid until funds are
22 available.

1 **Q. STAFF WITNESS YOUNG SEEMS TO SUGGEST THAT CENTRAL RIVERS**
2 **SHOULD HAVE ITS OWN EMPLOYEES (YOUNG DIR., P. 19, LN. 18-20).**
3 **WHY DOES CENTRAL RIVERS NOT HAVE EMPLOYEES?**

4 A. As I indicated in my Direct Testimony, I do not believe that Central Rivers is large
5 enough to support the employees and equipment that is necessary to maintain its
6 systems. Further, it is more efficient from a reporting and tax perspective to keep
7 the employees at the Construction Services level. Because of how I have
8 structured this, Central Rivers has no separate reporting for payroll taxes, no
9 individual workers compensation insurance to provide, and no additional
10 reporting concerning employees. It is much more efficient for those matters to be
11 addressed by Construction Services. As a result, Central Rivers has a simple
12 gain or loss at the end of the year based on its revenues and expenses that is
13 included in my income taxes.

14
15 **CONNECTION CHARGES**

16 **Q. IN YOUR DIRECT TESTIMONY, YOU PROVIDED A PRICE BREAKDOWN OF**
17 **THE COSTS CENTRAL RIVERS INCURS WHEN STEP UNITS ARE**
18 **INSTALLED. DO YOU HAVE INVOICES THAT SUPPORT THE PRICES YOU**
19 **USED FOR MATERIALS IN THAT PRICE BREAKDOWN?**

20 A. Yes. Invoices from suppliers that provide support for the material prices I
21 identified were previously provided to Staff and, in fact, are a part of Schedule
22 MRY-7, to the Direct Testimony of Staff witness Young (Staff DR 13.1).

1 **Q. YOU ALSO IDENTIFY CERTAIN LABOR COSTS ASSOCIATED WITH THESE**
2 **INSTALLATIONS. HOW DID YOU DERIVE THE HOURS REFLECTED IN**
3 **YOUR PRICE BREAKDOWN?**

4 A. I have been involved with STEP installations for over 15 years. During that time,
5 I would estimate that I have participated in over 250 installations. I have
6 estimated the time based on this experience. While differences in elevations and
7 soil conditions can change the time required, what I have identified is, in my
8 opinion, the time necessary for an “average” or “normal” installation.
9

10 **Q. DOES CENTRAL RIVERS OR CONSTRUCTION SERVICES HAVE**
11 **WORKORDERS OR OTHER RECORDS TO REFLECT THE TIME SPENT ON**
12 **PAST INSTALLATIONS?**

13 A. No. Because Construction Services has always gotten paid for such installations
14 at a fixed price, the Company has never had a need to record or maintain
15 records of individual installations.
16

17 **Q. HOW DO THE RATES CONSTRUCTION SERVICES CHARGES CENTRAL**
18 **RIVERS FOR STEP INSTALLATIONS COMPARE TO THOSE IT CHARGES**
19 **OTHER CUSTOMERS?**

20 A. They are less. Attached as **Schedule MEG-5** is an invoice for a grinder pump
21 installation for a residential homes in Loch Lloyd subdivision. Construction
22 Services charged a Mobilization fee of \$300.00; Backhoe @ \$95.00 per hour;

1 and, Plumber @ \$75.00 per hour. Central Rivers is charged \$225.00, \$85.00,
2 and \$60 for these items, respectively.
3

4 **Q. ARE YOU OPPOSED TO PERMITTING CUSTOMERS TO CHOOSE OTHER**
5 **PARTIES TO PERFORM STEP INSTALLATIONS?**

6 A. No.
7

8 **Q. WHAT WOULD BE REQUIRED IN ORDER TO MAKE THIS A PRACTICAL**
9 **OPTION?**

10 A. As stated in my Direct Testimony, I believe the tariff would have to be modified to
11 provide detailed specifications as to the type and quality of materials used, and a
12 process included for determining the location of the systems. Additionally, there
13 would need to be requirements for Company inspection of the materials prior to
14 installation, inspection of the system after installation, a provision for the
15 Company to tap the sewer main, and observation of the startup of the system.
16 Each of these activities would have a cost to the Company. Thus, I believe a
17 charge would need to be established and included in the tariff for each of these
18 activities.
19

20 **Q. ARE THERE ANY QUALIFICATIONS THAT SHOULD BE REQUIRED OF**
21 **THOSE PERFORMING SUCH INSTALLATIONS?**

22 A. Yes. In order to perform the installations, persons should be required to provide
23 evidence of master plumber certification and insurance related to the installation.

1 They also should be required to provide a three year warranty on parts, labor and
2 the installation.

3
4 **Q. DOES CONSTRUCTION SERVICES CURRENTLY MEET THESE**
5 **REQUIREMENTS?**

6 A. Yes.

7
8 **Q. AT THE LOCAL PUBLIC HEARING, A CUSTOMER OFFERED AN EXHIBIT**
9 **THAT PURPORTED TO BE A BID FOR A STEP INSTALLATION AT THE**
10 **COUNTRY HILL SUBDIVISION SYSTEM. WOULD THAT BID MEET THE**
11 **REQUIREMENTS THAT YOU HAVE OUTLINED ABOVE?**

12 A. It is unclear. It is not apparent from the paperwork whether the bidder holds
13 master plumber certification or whether a warranty is being offered on the
14 installation.

15
16 **Q. ARE THE MATERIALS IDENTIFIED IN THAT BID ACCEPTABLE?**

17 A. No.

18
19 **Q. WHY NOT?**

20 A. The septic tank would need certain inlet and outlet connections that will allow
21 minimal settlement and maintain the joint integrity (ferenco type non glue type).
22 The riser would need to be a uniform match to existing systems for lid
23 replacement and to provide tank integrity from infiltration.

1 The pump must be low volume high head 10 gal per minute and meet the pump
2 curve requirements required by the engineering study. The electrical and controls
3 and floats need to be uniform so they are all the same type for replacement and
4 maintenance. The filter basin that holds the pump and does not allow solids into
5 the system has to be uniform in order to match existing parts for replacement
6 quality and maintenance. The quality and uniform compliance to the standard is
7 the only way to maintain the integrity of the system for the long term protection of
8 the customer base.

9
10 **Q. WOULD THERE BE COSTS IN ADDITION TO THOSE IDENTIFIED IN THE**
11 **BID?**

12 A. Yes. In order to maintain the integrity of the system, it would be important for
13 Central Rivers to inspect the materials and the installation before it is buried and
14 at the time it is started up for service. Additionally, Central Rivers would still
15 need to tap the sewer main in order to bring the new customer on-line.

16
17 **Q. WHAT ADDITIONAL COSTS WOULD BE INCURRED BY CENTRAL RIVERS**
18 **IN ORDER TO PERFORM THESE TASKS?**

19 A. Each inspection would require the minimum service call fee at \$150.00 (2
20 required – before and after). The sewer main tap would require a mobilization fee
21 for the backhoe of \$225.00, which includes the 1st hour, and an additional hour
22 @ \$85.00 for backfill, a plumber for 2 hours @ \$60.00 per hour, and a tapping
23 saddle (\$53.49) with check valve (\$14.39) and valve (\$16.40), as well as a 6 inch

1 riser and Lid (pipe \$28.20, lid \$39.36). The total additional labor and backhoe
2 would be \$765.00. The total materials would be \$151.84. Thus, the total added
3 cost would be \$916.84.
4

5 **STEP INSTALLATIONS**

6 **Q. STAFF ALSO RAISES ISSUES CONCERNING CHARGES FOR PAST STEP**
7 **INSTALLATIONS. WHO WILL RESPOND TO THE ISSUE OF HOW THOSE**
8 **INSTALLATIONS SHOULD BE BOOKED FOR RATEMAKING PURPOSES?**

9 A. Mr. Johansen will address that issue in his testimony.
10

11 **Q. WHAT DID CENTRAL RIVERS CHARGE FOR STEP INSTALLATIONS?**

12 A. Central Rivers charged various amounts over the years. However, these
13 amounts always were consistent with the actual cost of performing those
14 installations.
15

16 **Q. STAFF WITNESSES YOUNG AND MERCIEL ALSO SUGGEST THAT**
17 **CENTRAL RIVERS SHOULD REFUND TO CUSTOMERS CERTAIN**
18 **AMOUNTS ASSOCIATED WITH THOSE PAST STEP INSTALLATIONS.**
19 **DOES CENTRAL RIVERS AGREE WITH SUCH A REFUND?**

20 A. No. As stated above, I believe the amounts charged were always equal to the
21 actual cost of such installations. Moreover, as this issue concerns past conduct
22 and not the setting of future rates, it would appear to be more appropriate for a
23 case other than a rate case.

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CUSTOMER DEPOSITS

Q. STAFF WITNESS YOUNG STATES ON P. 39, LN. 20 – P. 40, LN. 3, THAT “DURING THE COURSE OF THIS AUDIT, ALL PARTIES AGREED THAT THE COMPANY SHOULD REFUND ALL CUSTOMER DEPOSITS, WITH ACCRUED INTEREST, AND CEASE TO COLLECT THEM GOING FORWARD . . . STAFF PROPOSES THAT THE CUSTOMER DEPOSITS SHOULD BE REFUNDED OVER A 24 MONTH PERIOD.” IS IT ACCURATE THAT THE PARTIES AGREED?

A. It is accurate that such an agreement was a part of the Partial Disposition Agreement. However, as that Agreement is no longer in force, I do not believe it is appropriate to characterize anything in the Partial Disposition Agreement as having been “agreed to.” This having been said, it is Central Rivers intention to voluntarily make the customer deposit refunds identified by Staff witness Young in the manner he describes.

RATE CASE EXPENSE

Q. HAS CENTRAL RIVERS RECEIVED ANY ADDITIONAL INVOICES FOR RATE CASE EXPENSES SINCE THE FILING OF YOUR DIRECT TESTIMONY?

A. Yes. Attached as **Schedule MEG-6HC**, are copies of those additional invoices that have been received from Brydon, Swearngen & England P.C. and Johansen Consulting Services, LLC.

1 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT AND**
2 **REBUTTAL TESTIMONY?**

3 **A. Yes, it does.**